

# ENST Inspection Transmittal Summary Report

**Media:**  
RCRA CONTRACTO

**Inspection Type:**  
CEI

**Inspection Date:**  
05/08/2017

**NOV / NOPV / NOPF:**  
Yes

**Inspector:**  
BAH CONTRACTOR BAH CONTRACTOR

**Transmittal Date:**  
6/23/2017

**Facility Name:**  
Prinsco

JUN 23 2017

**Federal Facility:**  
No

**CBI Claimed:**  
No

**Address:**  
850 Hawkeye Road  
Jesup  
IA  
50648

**ID Number:**  
IAR000508150

**MM Participating Programs:**

**Facility Activity:**  
plastics pipe and pipe fitting mfg.

**Compliance Officer:**  
BETH KOESTERER

**ACS Code:**  **Potential EJ:**

**MM Screening Complete?**

**MM Screening Forwarded?**

If Yes, who? →

☐ ALL ☐ CAA ☐ E/RMP/T ☐ RCRA ☐ Wetlands  
☐ CWA ☐ UST ☐ UIC ☐ PWS ☒ SPCC ☐ EJ

**Selection Criteria 1:**  
IA SQG

**Selection Criteria 2:**

**Inspection Findings:**

1. Failure to mark or label used oil containers as "used oil".
2. Illegal disposal of hazardous waste.

RCRA



563412

# REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

AT

**PRINSCO, INC**  
850 Hawkeye Rd.  
Jesup, IA 50648  
(319) 827-6428

EPA RCRA ID No. IAR000508150

ON

May 08, 2017

BY

Booz Allen Hamilton

FOR

U.S. ENVIRONMENTAL PROTECTION AGENCY  
Region 7  
Environmental Sciences & Technology Division

## INTRODUCTION

At the request of the Environmental Sciences & Technology Division (ENST) and the Environmental Field Compliance Branch (EFCB) of the U.S. Environmental Protection Agency (EPA) Region 7, Booz Allen Hamilton (Booz Allen) conducted a Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI) on May 08, 2017 at Prinsco, Inc. (Prinsco) located in Jesup, Iowa. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. Booz Allen gathered information and data necessary for the EPA to determine compliance with applicable regulatory and statutory requirements. During the CEI, it was discovered that Prinsco currently generates less than 100 kilograms (220 pounds) of hazardous waste per calendar month. At this rate, Prinsco is currently operating as a conditionally exempt small quantity generator (CESQG) of hazardous waste. Prinsco is also a generator of used oil and an on-specification used oil burner. The CEI was conducted as a level B Multimedia Screening Inspection, and the *Region 7 Multimedia Screening Checklist* is included as Attachment 1.

Prinsco received a RCRA outreach and Data Verification Site Visit on October 16, 2007. During that visit, Prinsco was identified as a CESQG and an on-specification used oil burner. They have previously not received a CEI inspection.



## PARTICIPANTS

The following persons participated in the CEI. A copy of the business card obtained from the facility representative during the CEI is included in Attachment 2.

### Facility Representatives, Univar:

Name	Title	E-mail/fax	Phone
Jeremy Larsen	Plant Manager	<a href="mailto:JeremyL@prinsco.com">JeremyL@prinsco.com</a> fax: 319-827-3103	(319) 827-6428
Jeff Clayton	Production Manager	e-mail and fax not obtained	Phone number not obtained
Kenny Reisner	Mechanic	e-mail and fax not obtained	Phone number not obtained

### EPA Representative, Booz Allen:

Name	Title	E-mail/fax	Phone
Joshua A. Buehre	Associate	<a href="mailto:buehre_joshua@bah.com">buehre_joshua@bah.com</a> fax (816) 448-3801	(816) 448-3253

## INSPECTION PROCEDURE

I arrived at Prinsco at approximately 0740 hours on May 08, 2017 to conduct the visual reconnaissance. The visual reconnaissance was conducted to identify and document potential areas of concern from the adjacent roadways. I identified no environmental issues or areas of concern during this preliminary examination.

At approximately 0746 hours, I entered the facility through the main entrance. I was met by a receptionist. I asked for the contact name, Mr. Donald McMullen, that was listed on the Hazardous Waste Site Info Verification Report for Inspector. The receptionist informed me that Mr. McMullen was no longer employed at that facility, but she would contact Mr. Larsen, Plant Manager, to speak with me. Within two - three minutes, I was met by Mr. Larsen in the lobby area. I explained the purpose and scope of the CEI to Mr. Larsen. We retired to a conference room where I conducted an entry briefing with him. During the entry briefing, I presented Mr. Larsen with my EPA credential letter and business card. I also presented a letter from the EPA Task Order Contracting Officer Representative (TOCOR), Mr. Ken Herstowski; and a business card from Mr. Gary Witkovski. I explained that while Mr. Herstowski is the TOCOR, any CEI responses to the EPA should be directed to Mr. Witkovski. I also presented Mr. Larsen with a copy of RCRA §3007(a) (stipulating hazardous waste inspection authority) and a copy of 42 U.S.C. 1001/1002 (requiring the provision of truthful and accurate information and documentation). Mr. Larsen read these documents prior to proceeding with the CEI.

I then explained the EPA policy regarding the collection of confidential business information (CBI) to Mr. Larsen. I stated that, at the conclusion of the CEI, he would be presented with the EPA *Confidentiality Notice*. At that time, a CBI claim could or could not be made for any or all of the information collected during the CEI.



The CEI consisted of a discussion of facility operations, waste generation and waste management practices; review of pertinent records; and visual inspection. Mr. Larsen acted as the official facility representative during the CEI, and accompanied me during the visual inspection.

I completed the CEI and summarized my findings and recommendations on May 08, 2017 with Messrs. Larsen, and Clayton. Additionally, Mr. Paul Schrupp, Safety Coordinator and Mr. Joe Larkins, Director of Manufacturing were present via teleconference. Based upon the initial observations, **I issued a Notice of Preliminary Findings (NOPF) to Prinsco at the conclusion of the CEI.**

During the May 08, 2017 exit briefing, Mr. Larsen acknowledged receipt of the following by his signature: a Confidentiality Notice (Attachment 3), which he read and signed indicating no confidential business information had been provided during the CEI, a Receipt for Documents and Samples (Attachment 4), and the NOPF (Attachment 5). A total of eighteen (18) photographs were taken during the CEI, fifteen (15) of which are included in Attachment 6.

## **FINDINGS AND OBSERVATIONS**

### **Facility Operations**

Prinsco is a manufacturer of corrugated drain tile made from high density polyethylene (HDPE). Prinsco manufactures both rigid and flexible drain tile as well as fittings. Prinsco receives resin in bead (solid) form in bulk and in cubic yard containers. Resin is fed into production via an auger, into one of six extruders in the production area. The production area has one extruder that makes fittings in a blow molder. There are four flexible pipe extruders that manufacture flexible pipe from four inches to twelve inches in diameter. Additionally, a solid pipe extruder that produces various diameter pipe from four inches to twelve inches in diameter is in the production area. Solid pipe is inserted into the various size flexible piping to make it rigid. Flexible piping is coiled and placed into rolls and moved to the storage yard upon completion. All rigid piping is stacked outside the facility until shipment.

The majority of the facility is for warehousing of finished product and raw product that are utilized in the production process. Prinsco utilizes multiple metal storage (shipping) containers that also store fittings prior to sale.

Prinsco began operations at the current facility in 1979. Prinsco is located in an industrial area on the Northwest side of Jesup, Iowa. The facility consists of two buildings with approximately 95,000 square feet under roof. The largest building has been added onto since 1979 and consists of office, production, warehouse, and maintenance shop. The second building, located on the Northeast part of the property, is an unheated building for storage of product. Prinsco presently employs approximately sixty (60) full time employees who work one of three shifts (0700-1500, 1500-2300, and 2300-0700) Monday-Friday. Occasionally, Prinsco will work a sixth day. Additional Prinsco information is available at [www.prinsco.com](http://www.prinsco.com). Prinsco's primary North American Industrial Classification System (NAICS) code is 326122 (Plastics Pipe and Pipe Fitting Manufacturing).

## Facility Status

The Hazardous Waste Site Info Verification Report for Inspector (Attachment 7) indicates that Prinsco is registered with EPA, under EPA ID IAR000508150, as a conditionally exempt small quantity generator (CESQG) of hazardous waste. During the CEI, I determined Prinsco's hazardous waste generation rate through interviews with facility personnel and a review of hazardous waste records (manifests).

Prinsco's hazardous waste streams include waste isopropyl alcohol, spent parts washer fluid, waste rags from cleaning of parts with brake cleaner, and waste aerosol cans. Waste isopropyl alcohol is generated from density testing of product in the laboratory. A copy of the MSDS for isopropyl alcohol is included as Attachment 8. Prinsco utilizes approximately 8 ounces of isopropyl alcohol on a daily basis (approximately 10 pounds per month). Spent parts washer solvent (mineral spirits) is generated annually during the change out of the solvent [approximately 25 gallons annually, weighing 6.4 pounds per gallon (160 pounds)]. A copy of the MSDS for mineral spirits is included as Attachment 9. The spent parts washer solvent is placed into the used oil and burned in the used oil space heater. Rags are utilized to wipe down parts that have been sprayed with brake cleaner, that are too large or cannot be cleaned in the part washer. The brake cleaner is 90-100 % tetrachloroethylene. A copy of the MSDS for brake cleaner is included as Attachment 10. Approximately 30-40 used rags (approximately five pounds) is generated per month. Used rags are disposed in the general refuse. Approximately two or three waste aerosol cans (less than one pound) are generated monthly and disposed in the general refuse. Therefore, I calculated that Prinsco generates approximately 16 pounds [waste isopropyl alcohol (ten pounds), used rags (five pounds), waste aerosol cans (less than one pound)] 11 months per year. Prinsco generates 176 pounds (the regular monthly hazardous waste of 16 pounds, and 160 pounds of spent parts washer solvent) one month per year. As Prinsco generates between 16 pounds and 176 pounds of hazardous waste per month, they are operating as a CESQG of D001, D039 characteristic, and F002 listed hazardous waste.

The Hazardous Waste Site Info Verification Report for Inspector sheet was updated to include Jeremy Larsen as the site contact, removed waste codes D002, D027, D028, F003, F004 and F005 and added F002.

## Facility Waste Streams

The following is a Waste Stream and Waste Handling Table for Prinsco. The table describes the major waste streams generated on-site, waste management practices, and off-site treatment, storage, and disposal. A description of the major waste streams and management practices is also found in the *CEI Worksheets and Checklists* (Attachment 11).

**Waste Stream and Waste Handling Table  
Prinsco, Inc.—Jesup, IA**

<b>Name of Waste Stream</b>	<b>Hazardous Determination</b>	<b>Generating Process</b>	<b>Estimated Generation Rate</b>	<b>On-Site Management</b>	<b>Off-Site Management</b>
1) Waste Isopropyl Alcohol	Hazardous (D001) by product/process knowledge (MSDS)	Completion of daily laboratory density testing of product.	Laboratory uses 8 oz. per day and is calculated at an average of 1.35 gallons per month. Approximately 10 pounds per month.	Accumulated in a 5-gallon open container located outside office for evaporation.	None
<b>NOPF No. 2; See Visual Inspection section for associated finding, which includes illegal disposal of hazardous waste.</b>					
2) Spent Parts Washer Solvent	Hazardous (D001) by product/process knowledge (MSDS)	Change out of spent parts washer solvent.	Approximately 30 gallons annually, weighing 6.4 pounds per gallon. Approximately 16 pounds per month.	Spent parts washer solvent is placed in used oil storage container.	None
3) Used Rags	Hazardous (F002) by product/process knowledge (MSDS)	Cleaning with brake cleaner; parts too large to fit into parts washer	Approximately 30-40 rags per month. Approximately, 5 pounds per month.	Disposed in general refuse	Transported by Black Hawk County Waste Disposal in Waterloo, IA, to Black Hawk County Landfill
4) Waste Aerosol Cans	Hazardous (D039) by product/process knowledge	Empty cans from cleaning parts	Approximately 2-3 aerosol cans per month.	Disposed in general refuse	Transported by Black Hawk County Waste Disposal in Waterloo, IA, to Black Hawk County Landfill
5) Used Oil	Managed as used oil (per 40 CFR §279)	Equipment and fleet truck maintenance	Approximately 1500 – 2000 gallons annually.	Stored in 250 gallon polyethylene used oil storage containers. Used oil is burned in used oil space heater for heat energy in the winter.	None
<b>NOPF No. 1; See Visual Inspection section for associated finding, which includes failure to label used oil containers.</b>					

**Waste Stream and Waste Handling Table  
Prinsco, Inc.—Jesup, IA**

<b>Name of Waste Stream</b>	<b>Hazardous Determination</b>	<b>Generating Process</b>	<b>Estimated Generation Rate</b>	<b>On-Site Management</b>	<b>Off-Site Management</b>
6) Used Oil Filters	Nonhazardous by product knowledge	Maintenance Operations	Approximately 200 filters per year	Punctured and hot drained into used oil container prior to disposal in general refuse.	Transported by Black Hawk County Waste Disposal in Waterloo, IA, to Black Hawk County Landfill
7) Spent Fluorescent Lamps	Hazardous (D009) and nonhazardous	Maintenance Operations	Approximately 13 mercury containing and 100 green tipped lamps per year	Placed in general refuse when changed.	Transported by Black Hawk County Waste Disposal in Waterloo, IA, to Black Hawk County Landfill
8) Scrap Pallets	Nonhazardous by product/process knowledge	Raw materials Shipments	Approximately 5000 pallets per year.	In a trailer outside of the facility	Broken Pallet Co., Inc., Moorland, IA
9) Lead-Acid Batteries	Hazardous (D008); facility manages per 40 CFR §266 Subpart G	Maintenance replacing used batteries	Approximately 25 batteries per year.	Accumulated in the Storage Building	Jeff Clayton for sent lead reclamation at smelter
10) Scrap Steel	Nonhazardous by product/process knowledge	Maintenance and packaging disposal	Approximately 6 tons per year.	Stored in cargo container until shipped off site.	Jeff Clayton for recycling
11) General Refuse	Nonhazardous by product/process knowledge	Office and General Refuse in facility	Approximately 24 cubic yards per month plus a 20 cubic yard container semiannually.	Various containers throughout the facility	Transported by Black Hawk County Waste Disposal in Waterloo, IA, to Black Hawk County Landfill



## Visual Inspection

The manufacturing processes, Laboratory testing, and facility maintenance activities generate the solid and hazardous wastes listed in the Waste Stream and Waste Handling Table above. During the CEI, the generation and accumulation areas associated with these wastes were visually inspected. A copy of the facility map obtained during the CEI is included as Attachment 12. Mr. Larsen acted as the facility representative and accompanied me during the visual inspection. A Google Earth image of the facility is included as Attachment 13.

In the Production area, I observed a small metal 1/3 cubic yard container for solid waste that contained HDPE scrap, an empty latex paint can, and other plant general refuse (Attachment 6, Photographs 1 and 2). The production area includes six different extruding machines for manufacturing of the flexible and rigid pipe as well as fittings. Bead resin is heated and injected into the extruders. During startup, scrap HDPE is generated due to the inability to properly form due to inadequate temperature. The scrap HDPE is saved and ground for reintroduction into the production system. According to Mr. Larsen, only virgin product can be used for Iowa Department of transportation work. The off specification material that is ground can not be used for that customer. The ground material is utilized in all other pipe production.

Mr. Larsen and I proceeded to the Maintenance area of the facility where fleet trucks, forklifts and all other maintenance activities occur. Immediately outside of the Maintenance area, I observed two, 250-gallon used oil storage containers. One of the containers is labeled with the words "used oil" and the other was not labeled with the words "used oil" (Attachment 6, Photographs 3 – 5).

### **NOPF No. 1 – Failure to label used oil containers with the words "used oil". [40 CFR §279.22(c)(1)].**

After informing Mr. Larsen that the used oil storage containers must be labeled with the words "used oil," Mr. Larsen summoned the Mechanic, Mr. Reisner. Upon Mr. Reisner's arrival, I explained to Mr. Reisner the reason for my visit and had him read a copy of 42 U.S.C. 1001/1002 which he read prior to continuing the CEI. I explained that the container is not labeled with the words "used oil." Mr. Reisner went to the Maintenance area and returned with a label with the words "used oil" and placed the label on the used oil storage container (Attachment 6, Photograph 6).

Mr. Larsen and I proceeded into the Maintenance area. Inside the Maintenance area, I observed a parts washer (Attachment 6, Photograph 7). I asked Mr. Larsen what is done with spent parts washer solvent. Mr. Larsen stated that, when spent, it is transferred to a used oil storage container. I asked if any other wastes (i.e. Brakleen Brake Parts Cleaner or other aerosols) are sprayed into the parts washer. Mr. Larsen was not aware but asked Mr. Reisner to return and answer my question. Mr. Reisner stated that no other waste aerosols are sprayed into the parts washer.

In the Maintenance area, I observed a can of Brakleen Brake Parts Cleaner. The brake cleaner was not labeled as chlorine free. I looked at the ingredients on the can and tetrachloroethylene was the major ingredient. I explained that the brake cleaner can never go into the parts washer, due to the presence of tetrachloroethylene. Mr. Reisner stated that the brake cleaner is used to clean parts that are too large or heavy to be cleaned in the parts washer. I asked how the parts are cleaned with the brake cleaner. Mr. Reisner stated that the brake cleaner is sprayed onto the parts and wiped off with rags to clean them. I asked Mr. Reisner what is done with the rags that are generated from cleaning parts with the brake cleaner. Mr. Reisner stated that they placed into an oily rag container in the Maintenance area (Attachment 6, Photographs 8 and 9). When the container is full, they are thrown in the general refuse. I then asked Mr. Reisner how many are disposed on a monthly basis. Mr. Reisner stated that approximately 30-40 rags are disposed into the general refuse per month.

In the Maintenance area, fleet truck, and fork truck maintenance and repairs are performed. Prinsco has eleven fork trucks and five (5) fleet trucks. Five of the fork trucks are used to move and load pipe that is stored outside. Six fork trucks are utilized inside. All of the fleet and fork trucks utilize combustion engines and require maintenance, including oil change and maintenance. Oil that is collected is containerized in 250-gallon used oil storage containers. Used oil is stored and utilized as fuel for the used oil space heater located in the maintenance shop during the winter months. Used oil filters that are generated during the maintenance activities and are punctured and hot drained, then disposed in the general refuse. I asked how many used oil filters they generate. Mr. Reisner stated that he performs approximately 200 oil filter changes per year. I also explained that the Iowa Department of Natural Resources does not allow filters to be disposed of in landfills. I explained that they could contact the scrap metal company that they utilize and see if they will take them.

The Maintenance area utilizes a used oil space heater as a heat source during the winter months. The used oil space heater is a Lanair® brand furnace with a BTU value of 300,000 (Attachment 14). The used oil space heater has a 215-gallon steel used oil storage tank that is located at the base of the unit. During the inspection, the tank is not labeled with the words “used oil” (Attachment 6, Photographs 10 and 11).

**NOPF No. 1 – Failure to label used oil storage container with the words “used oil” [40 CFR §279.22(c)(1)].**

When Mr. Reisner realized that the tank was not labeled, he promptly placed a used oil label on the used oil storage tank (Attachment 6, Photograph 12).

During the discussion of used oil that is burned, I asked Mr. Larsen if they generate enough used oil to heat the area through the winter. Mr. Larsen stated that in February of 2016, they purchased 2000 gallons used oil from Northland Oil, located in Waterloo, IA. I asked if the oil was sampled to ensure that it was on specification. Mr. Larsen provided me with paperwork showing that the used oil received for heating was on

specification (Attachment 15). Mr. Larsen stated that Prinsco has not received used oil at any other time in the past 5 years.

I asked Mr. Reisner if Prinsco generates used batteries from the maintenance of the fleet trucks and fork trucks. Messrs. Reisner and Larsen took me to a location outside the maintenance area where batteries are stored, in a cargo container, prior to shipment to the scrap metal recycler. In the cargo container, there were five (5) batteries stored for recycling (Attachment 6, Photograph 13). I asked how often batteries are shipped off site and Mr. Reisner stated that the batteries are shipped off-site approximately every 3 months. I asked if there was an inventory for the number of batteries recycled. Mr. Larsen provided a copy of a record of the sale of scrap batteries to Jeff Clayton (Attachment 16).

Mr. Larsen and I proceeded to the warehouse areas of the facility. I observed no wastes while visual inspecting the warehouse. I asked Mr. Larsen what is done with the spent fluorescent lamps that the facility generates. He stated that they are disposed in the general refuse when they are changed. I asked Mr. Larsen, how many spent lamps are generated. Mr. Larsen was unsure of the number of spent lamps that they generate. I asked for copies of invoices for lamps that have been ordered in the past year and an inventory of the number of lamps that they have remaining on-site to determine the number of lamps disposed on an annual basis (Attachment 17).

In Inventory, there are a total of 12, T8 lamps. Prinsco ordered 25, T8 lamps in April 2016, therefore, 13 lamps were changed and disposed in the general refuse. Additionally, in inventory there were 31, T5 lamps, and Prinsco ordered 80 lamps in October 2016. In a 6-month period Prinso replaced 49, T5 lamps and disposed in the general refuse. This calculates to a total of 98 T5 lamps annually. Based upon this information, it is estimated that Prinsco disposed of 111 (13, T8's; and 98, T5's) lamps in one year.

Mr. Larsen and I proceeded into the office where the laboratory is located. As we were walking up the steps to the office, I identified a small, approximately 3-gallon plastic container with the words "flammable" on the outside. The container has a lid with a 3-4 inch square opening in the corner (Attachment 6, Photograph 14). The container was holding less than one inch of liquid. I asked Mr. Larsen what this container is utilized for. Mr. Larsen stated that the alcohol from the density lab is placed in the container at the end of each day. I asked what is done with the alcohol that is in the container. He stated that it is allowed to evaporate. The container is never full, so nothing is done with the waste. I asked how much waste is placed into the container on a daily basis. He said that the lab uses approximately 8 ounces of isopropyl alcohol each day. Based upon the information that Mr. Larsen provided, it appears that Prinsco is illegally disposing of a hazardous waste.

#### **NOPF No. 2 – Illegal disposal of Hazardous Waste. [40 CFR §261.5(g)(3)].**

Mr. Larsen and I then proceeded to his vehicle where he drove me through the storage yard behind the facility. The storage yard had one 20 cubic yard container for general



refuse. Upon observation, there were only broken pallets and other debris in the container. No other waste was identified during the drive through the storage area. At the conclusion of the drive through the storage yard, a 12,000-gallon fuel oil tank was observed (Attachment 6, Photograph 15). Mr. Larsen stated that the fuel oil is used for fueling the fork trucks in the storage yard as well as the fleet trucks that they have for delivery.

## Records

On May 08, 2017, I reviewed the following facility records:

- MSDS for Isopropyl Alcohol (Attachment 8)
- MSDS for Regular Mineral Spirits (Attachment 9)
- MSDS for Brakleen Brake Parts Cleaner (Attachment 10)
- Specification sheet for used oil space heater (Attachment 14)
- Analytical for shipment of used oil from Northland Oil to Prinsco (Attachment 15)
- Prinsco Batteries Recycled (Attachment 16)
- Fluorescent Lamp Inventory and invoices for past year (Attachment 17)
- Scrap Steel Recycled in 2015 and 2016 (Attachment 18)
- Pallet shipments since May 26, 2016 (Attachment 19)

Prinsco has not shipped any hazardous waste off-site in the past 3 years. I observed no hazardous waste accumulation areas during the inspection.

On May 08, 2017, I conducted an exit interview with Messrs. Larsen, Clayton, Schrupp and Larkins. I explained the findings and observations noted during the CEI, and the regulations pertaining to each. Additionally, I provided Mr. Larsen with copies of the following materials:

- Copy of RCRA §3007(a)
- Copy of 42 U.S.C. 1001/1002
- EPA *Publications for Small Business*
- EPA Information Sheet: *Commercial Motor Vehicle Transportation System Security & Safety-CMV Transportation Security Planning*
- EPA Homeland Security Bulletin: *US EPA Region 7, December 2001, Security Awareness for Agricultural/Industrial Facilities, Pipelines, Transporters, Utilities, Warehouses of Chemicals*
- EPA *Managing your Hazardous Waste, a Guide for Small Business*
- EPA Used Oil Management Standards handout
- EPA Fact Sheet: *Managing Used Oil, Advice for Small Business*
- EPA Environmental Fact Sheet: *Properly Managing Used Oil Filters*
- EPA Environmental Compliance Assistance Centers: Sector Specific Centers pamphlet
- EPA Office of Enforcement and Compliance Assurance Information Sheet: US EPA Small Business Resources handout
- EPA Industry Sector Notebooks handout

- EPA RCRA Online Reference Guide
- Iowa Department of Natural Resources Iowa Waste Exchange handout and pamphlet
- Iowa Department of Natural Resources Pollution Prevention Services pamphlet
- Iowa Department of Natural Resources Pollution Prevention Services folder
- Iowa Department of Economic Development *Iowa Environmental Guide for Business*
- Iowa Waste Reduction Center On-Site Review Program pamphlet
- Pollution Engineering article *10 Common Questions for Waste Generators*
- Instructions for Responding to an NOPF

## SUMMARY

During the Prinsco CEI, I discovered through interviews with Mr. Larsen, records review, and visual inspection that Prinsco generates approximately 16 pounds [waste isopropyl alcohol (ten pounds), used rags (five pounds), waste aerosol cans (less than one pound)] 11 months per year. Prinsco generates 176 pounds (the regular monthly hazardous waste of 16 pounds, and 160 pounds of spent parts washer solvent) one month per year. As Prinsco generates between 16 pounds and 176 pounds of hazardous waste per month, they are operating as a CESQG of D001, D039 characteristic, and F002 listed hazardous waste. As such, Prinsco is currently operating as a CESQG of hazardous waste. Prinsco is also operating as a generator of used oil and an on-specification used oil burner.

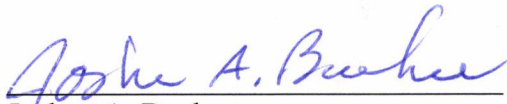
**I issued an NOPF to Prinsco at the conclusion of the CEI.** The NOPF included:

**NOPF No. 1 – Failure to label used oil containers with the words “used oil”. [40 CFR §279.22(c)(1)].**

**NOPF No. 2 – Illegal disposal of Hazardous Waste. [40 CFR §261.5(g)(3)].**

Before exiting the facility, I referred to the EPA TOCOR’s information letter, and Technical Advisor (Mr. Witkovski) business card, which was presented to Mr. Larsen during the entry briefing.

Other than items specifically noted in the narrative, I observed no additional issues. However, further review by EPA might change or add to my findings.

  
Joshua A. Buehre

Date: 6/16/2017

#### ATTACHMENTS

- 1: Region 7 Multimedia Screening Checklist (2 pages)
- 2: Copies of Facility Representative Business Card (1 page)
- 3: Copy of the EPA Confidentiality Notice (1 page)
- 4: Copy of the EPA Receipt for Documents and Samples (1 page)
- 5: Notice of Preliminary Findings (NOPF) (1 page)
- 6: Photographic Documentation (10 pages)
- 7: Copy of Hazardous Waste Site Info Verification Report for Inspector (2 pages)
- 8: MSDS for Isopropyl Alcohol (12 pages)
- 9: MSDS for Regular Mineral Spirits (8 pages)
- 10: MSDS for Brakleen Brake Parts Cleaner (9 pages)
- 11: CEI Worksheets and Checklists (20 pages)
- 12: Copy of Site Map (1 page)
- 13: Copy of Google Earth Image of Facility (1 page)
- 14: Copy of Specification sheet for used oil space heater (1 page)
- 15: Copy of Analytical and Bill of Lading for shipment of used oil from Northland Oil to Prinsco (4 pages)
- 16: Copy of Batteries Recycled (1 page)
- 17: Copy of Fluorescent Lamp Inventory and Invoices for the past year (3 pages)
- 18: Copy of Scrap Steel Recycled in 2015 and 2016 (1 page)
- 19: Copy of Pallet Shipments since May 26, 2016 (1 page)



Forward To:

EPCRA / RMP / TSCA ☐

CWA ☐

Wetlands ☐

UIC ☐

PWS ☐

CAA ☐ RCRA ☐

UST ☐

SPCC ☒

## REGION VII MULTIMEDIA SCREENING CHECKLIST

Facility Name: Prusco, Inc.  
Facility Ownership: \_\_\_\_\_  
Street: 850 Hawkeye Rd  
City: Jesup State: GA Zip: 30648  
Phone: 319 827 6428 Facility Contact: Jeremy Larsen  
Number of Employees: 60 Work Hours/Shifts: 7-3, 3-7, 7-11/3

Inspector: Joseline Buehler  
Primary Media: RLRA  
Inspector Phone Ext.: 816 448 3253  
Date: 5/8/2017  
SIC/NAICS Code: 326122  
Facility Subject to OSHA regulations Yes ☒ No ☐

Main facility activity, major process chemical(s) & description: Manufacturer of HDPE Pipe, utilizing HDPE Bead Resin (solid)

(Check all that apply): painting/coating (water-based ☐, solvent-based ☐) , printing ☐ , reacting ☐ , formulating ☐ , distilling ☐ ,  
water treatment ☐ , refrigeration ☐ , manufacturing ☐ , parts washers/degreasing (water-based ☐ , halogenated-based ☐ ,  
non-halogenated-based ☒ , combustion (boiler, furnaces, oxidizers) ☒ plating (chrome ☐ , other \_\_\_\_\_).

### EMERGENCY PLANNING & COMMUNITY RIGHT TO KNOW ACT (EPCRA) & TOXIC SUBSTANCE CONTROL ACT (TSCA)

1. Did facility file a Tier II report with fire department, Local & State Emergency Planning Committee? Yes ☒ No ☐ *Forward to EPCRA*
2. Did facility manufacture, import, or process (formulate, blend, package) >25,000 lbs of a chemical or >100 lbs of a Persistent Bioaccumulative Toxin (lead, mercury, or polycyclic aromatic compounds) at any time over the last 5 years? No ☒ (stop) Yes ☐ *Forward to EPCRA*
3. Has the facility: *If any box in question 3 is marked - Forward to EPCRA*
  - a. Stored ≥500 lbs of ammonia ☐ , ≥100 lbs of chlorine ☐ , or ≥10,000 lbs of an industrial chemical ☐ , at any time over the last 2 years? ☐
  - b. Stored ≥10,000 lbs of pressurized flammable material (propane, methane, butane, pentane, etc.) at any time over the last 2 years? ☐
  - c. Used ≥10,000 lbs of ammonia ☐ , chlorine ☐ , halogenated solvents ☐ , solvent-based paints ☐ , or solvents ☐ , or nitrated compound, over the last calendar year? ☐
  - d. Generated ≥ one half pound of metal dusts, fumes, or metal turnings, over the last calendar year? ☐
4. Does the facility have any oil filled electrical equipment No ☒ (stop) Yes ☐ *Forward to PCB and ask* Has facility tested oil filled equipment to determine PCB content; No ☐ Yes ☐ number containing PCBs greater than 50 ppm \_\_\_\_\_ and percent of all equipment tested \_\_\_\_\_. Is equipment leaking (including wet or weeping equipment)? No ☐ Yes ☐ - *Get Photo*

### CLEAN WATER ACT (CWA) - National Pollution Discharge Elimination System (NPDES), Industrial Pretreatment, Storm Water, & Wetlands

1. Does the facility discharge any water/wastewater to storm sewers, surface water, or the land? No ☒ (stop) Yes ☐  
If yes, are all water/wastewater discharges permitted? Yes ☒ No ☐ *Forward to CWA*
2. Does the facility have process wastewaters that are discharged to a city POTW (Publicly Owned Treatment Works)? No ☒ (stop) Yes ☐  
If yes, are the discharges permitted by: State? ☐ , City? ☐ - If yes, Stop here. No ☐ *Forward to CWA*  
If yes, does the city have a state or EPA approved pretreatment program? Yes ☐ No or Don't Know ☐ *Forward to CWA*
3. During rainfall events, can storm water carry pollutants from manufacturing, processing, storage, disposal, shipping and receiving areas, or from construction sites >1 acre, to storm sewers or surface water? No ☐ (stop) Yes ☒  
If yes, does the facility have an NPDES permit for these storm water discharges? Yes ☒ No ☐ *Forward to CWA*
4. Did you see any wastewater discharges not identified by the facility? No ☒ (stop) Yes ☐ - Identify location, time, appearance of discharge: \_\_\_\_\_  
(Get Photo) *Forward to CWA*
5. Does the facility have any wetland areas (e.g. streams, ponds, or temporarily wet areas)? No ☒ (stop) Yes ☐  
If yes, have any wetland areas been dredged, filled, channelized, dammed, or had gravel removed from them within the last 5 years?  
No ☐ (stop) Yes ☐ - Identify location and timeframe \_\_\_\_\_ (Get Photo) *FWD to Wetlands*



### SAFE DRINKING WATER ACT (SDWA) - Underground Injection Control (UIC) & Public Water System (PWS)

1. Does facility discharge any liquids to the subsurface (septic systems, disposal wells, cesspools, etc.)? No ☒ (stop) Yes ☐ *Forward to UIC*  
If yes, do these liquid wastes consist of sanitary wastewater only? Yes ☐ No ☐
2. Does facility provide drinking water to 25 people or more from its own source (private well, pond, etc)? No ☒ (stop) Yes ☐ *Forward to PWS*  
If yes, does the facility test or monitor its drinking water in order to comply with state regulations? Yes ☐ No ☐

### CLEAN AIR ACT (CAA)

1. Do you see any dense, non-steam, smoke or dust emissions leaving the facility property? No ☒ Yes ☐ *Forward to CAA*  
Source \_\_\_\_\_ (*Get Photo*)
2. Does the facility have any new air pollution emitting equipment that was constructed or installed in the past 5 years? No ☒ (stop) Yes ☐  
If yes, is equipment permitted? Yes ☐ No ☐ *Forward to CAA Describe:* \_\_\_\_\_
3. Does the facility have a refrigeration process that contains more than 10,000 lbs of ammonia? No ☒ (stop) Yes ☐ *Forward to EPCRA/RMP*

### RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) and UNDERGROUND STORAGE TANKS (UST)

1. Does the facility generate more than 30-gallons (220 lbs./100kg) of hazardous waste per month or at any one time? No ☒ (stop) Yes ☐  
If yes, does facility have an EPA Hazardous Waste Identification Number? Yes ☐ (stop) No ☐ *Forward to RCRA*
2. Is hazardous waste treated ☐ , stored >90-days ☐ , burned ☐ , land filled ☐ , put in surface impoundments ☐ or waste piles ☐ ?  
No ☒ (stop) Yes ☐ If yes, is the facility permitted for above described activity? Yes ☐ No ☐ *Forward to RCRA*
3. Did you see or does the facility have any large quantities of materials **that the facility claims to be non-hazardous waste material** (>10 drums, roll-offs, waste piles, etc. – exclude clean office trash, cardboard, & packaging type wastes)? No ☒ (stop) Yes ☐

#### Material Claimed To Be Non-Hazardous

#### How does the facility know these wastes are non-hazardous?

_____	Testing, industry or manuf. info., MSDS, etc. <input type="checkbox"/> ; None available <input type="checkbox"/> <i>Forward to RCRA</i>
_____	Testing, industry or manuf. info., MSDS, etc. <input type="checkbox"/> ; None available <input type="checkbox"/> <i>Forward to RCRA</i>
_____	Testing, industry or manuf. info., MSDS, etc. <input type="checkbox"/> ; None available <input type="checkbox"/> <i>Forward to RCRA</i>
_____	Testing, industry or manuf. info., MSDS, etc. <input type="checkbox"/> ; None available <input type="checkbox"/> <i>Forward to RCRA</i>
_____	Testing, industry or manuf. info., MSDS, etc. <input type="checkbox"/> ; None available <input type="checkbox"/> <i>Forward to RCRA</i>

4. Did you see any leaking hazardous waste containers, drums, or tanks? No ☒ Yes ☐ *Forward to RCRA*  
Describe: \_\_\_\_\_ (*Get Photo*)
5. Did you see any signs of spills or releases (e.g., dead or stressed vegetation, stains, discoloration)? No ☒ Yes ☐ *Forward to RCRA*  
Describe: \_\_\_\_\_ (*Get Photo*)
6. Did you see any chemical or waste handling practices that concern you (access to children/public)? No ☒ Yes ☐ *Forward to RCRA & EPCRA Describe:* \_\_\_\_\_ (*Get Photo*)
7. Does the facility have any past or present underground petroleum product or hazardous material tanks? No ☒ Yes ☐ *Forward to UST*
8. Does the facility have any underground fuel tanks for emergency generators? No ☒ Yes ☐ *Forward to UST*

### SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN (SPCC)

1. Does the facility have any aboveground oil tanks (petroleum, synthetic, animal, fish, vegetable), with an aggregate volume >1,320 gallons?  
No ☐ (stop) Yes ☒ - Does the facility have a certified SPCC Plan? Yes ☐ No ☒ *Forward to SPCC*  
If yes, are there secondary containment systems for the tanks? Yes ☒ No ☐ *Forward to SPCC*  
If yes, are any tanks leaking where oil could reach waters of the State or U.S.? No ☒ Yes ☐ (*Get Photo*) *Forward to SPCC*



**PRINSCO**  
ENGINEERED WITH INTEGRITY™

WATER MANAGEMENT  
SOLUTIONS

## JEREMY LARSEN

Plant Manager

800-728-6428

o) 319-827-6428

M) 660-373-2345

F) 319-827-3103

JeremyL@Prinsco.com

850 Hawkeye Rd

Jesup, IA 50648

WWW.PRINSCO.COM

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
CONFIDENTIALITY NOTICE

Facility Name <i>Prinsco, Inc</i>	
Facility Address <i>850 Hawkeye Rd, Jesup, IA</i>	
Inspector (print) <i>Joshua Buehne</i>	
U.S. EPA, Region 7, 11201 Renner Blvd., Lenexa, KS 66219 <i>JAB</i> <i>Booz Allen Hamilton</i>	Date <i>5/8/2017</i>

The United States Environmental Protection Agency (EPA) is obligated, under the Freedom of Information Act, to release information collected during inspections to persons who submit requests for that information. The Freedom of Information Act does, however, have provisions that allow EPA to withhold certain confidential business information from public disclosure. To claim protection for information gathered during this inspection you must request that the information be held CONFIDENTIAL and substantiate your claim in writing by demonstrating that the information meets the requirements in 40 CFR2, Subpart B. The following criteria in Subpart B must be met:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. No statute specifically requires disclosure of the information.
3. Disclosure of the information would cause substantial harm to your company's competitive position.

Information that you claim confidential will be held as such pending a determination of applicability by EPA.

I have received this Notice and <u>DO NOT</u> want to make a claim of confidentiality at this time.	
Facility Representative Provided Notice (print) <i>Jeremy Larsen</i>	Signature/Date <i>Jeremy 2 5-8-17</i>

I have received this Notice and <u>DO</u> want to make a claim of confidentiality.	
Facility Representative Provided Notice (print)	Signature/Date

Information for which confidential treatment is requested:

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Attachment 3 Page 1 of 1



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
RECEIPT FOR DOCUMENTS AND SAMPLES

Facility Name <i>Prinsco, Inc</i>
Facility Address <i>850 Hawkeye Rd, Jesup, IA 50648</i>

Documents Collected? YES ☒ (list below) NO ☐

Samples Collected? YES ☐ (list below) NO ☒ Split Samples: YES ☐ NO ☒

Documents/ Samples were: 1) Received no charge ☒ 2) Borrowed ☐ 3) Purchased ☐

Amount Paid: \$  Method: Cash ☐ Voucher ☐ To Be Billed ☐

The documents and samples described below were collected in connection with the administration and enforcement of the applicable statute under which the information is obtained.

Receipt for the document(s) and/or sample(s) described below is hereby acknowledged:

- ① Facility Map (1 page)
- ② Battery Report (1 page)
- ③ used oil furnace Specifications (1 page)
- ④ Used oil delivery (3 pages)
- ⑤ T-8 lamps purchased (1 page)
- ⑥ T-5 lamps purchased (1 page)
- ⑦ Lamp Inventory (1 page)
- ⑧ Pallet inventory shipped - 1 year - (1 page)
- ⑨ Scrap steel recycled
- ⑩ Parts Washer Solvent SDS (8 pages)
- ⑪ Isopropyl Alcohol<sup>70%</sup> (12 pages)
- ⑫ Brake Cleaner SDS (9 pages)

Facility Representative (print) <i>Jeremy Larsen</i>	Signature/Date <i>Jeremy Larsen</i> 5/8/17
Inspector (print) <i>Joshua Buehne</i>	Signature/Date <i>Joshua Buehne</i> 5/8/2017
U.S. EPA, Region 7, 11201 Renner Blvd., Lenexa, KS 66219 <i>Beck Allen Hamilton</i> JAB	



NOTICE OF PRELIMINARY FINDINGS

FACILITY NAME: Prinsco, Inc.  
ADDRESS: 850 Hawkeye Rd  
Tesup, IA 50648  
EPA ID NUMBER: IAR000508150 DATE: 5/8/2017

NOTICE: I am not an employee of the Environmental Protection Agency ("EPA"). I am a contractor for EPA retained to conduct compliance evaluation inspections. The following is a list of observations/recommendations found during this inspection which will be reported back to EPA. This is not to be construed as a complete list of observations/recommendations. The EPA will be evaluating the report prepared as a result of this inspection and making the determinations as to what violations may have occurred at your facility.

1. Failure to label used oil containers with the words  
"used oil" 40 CFR 279.22(c)(1)
2. Illegal disposal of hazardous waste 40 CFR 261.5(g)(3)
3. \_\_\_\_\_
4. \_\_\_\_\_
5. \_\_\_\_\_
6. \_\_\_\_\_
7. \_\_\_\_\_

If you have any questions regarding these findings please contact Gary Witkowski

The undersigned person hereby acknowledges receipt of a copy of this document and has read the same.

PRINTED NAME: Jeremy Larsen TITLE: Plant Manager  
SIGNATURE: [Signature]

This document was prepared by Joshua Buehre



## PHOTO LOG

Facility Name / City: Prinsco, Inc.  
850 Hawkeye Rd.  
Jesup, IA 50648

Facility ID #: IAR000508150

Date: May 08, 2017

Photographer: Joshua A. Buehre

Type of Camera: Sony Digital Still Camera, DSC – W370, Serial #567825

Digital Recording Media: Memory Stick

All digital Photos were copied by: Joshua A. Buehre on 05/27/2017

All digital Photos were copied to: to print and CD-R

Original copy is stored in: CD-R. All digital Photos were downloaded to CD-R by Joshua A. Buehre on 05/27/2017. No changes were made in the original image files prior to print and storage on the CD-R.

Report Photo #	Photographer	Date	Approx. Time	File Name (DSC00xxx.jpg)	Description
1	Joshua Buehre	05/08/2017	0817	002	Exterior of a less than one cubic yard container for trash disposal in Production area.
2	Joshua Buehre	05/08/2017	0817	001	Photo of the less than 1 cubic yard container identified in Photograph 1 that is used for trash disposal in the Production area.
3	Joshua Buehre	05/08/2017	0832	005	A 250-gallon used oil container located immediately adjacent to the Maintenance area.
4	Joshua Buehre	05/08/2017	0833	006	Used oil container identified in Photograph 3, showing no used oil label.
5	Joshua Buehre	05/08/2017	0833	007	Another photograph of the used oil container identified in Photograph 3, showing no used oil label.
6	Joshua Buehre	05/08/2017	0834	008	Photo of container identified in Photographs 3-5 showing the used oil label on the container.
7	Joshua Buehre	05/08/2017	0837	009	Parts washer located in the Maintenance area of the facility.
8	Joshua Buehre	05/08/2017	0911	015	An oily waste rag container utilized for the disposal of oily rags from maintenance activities.
9	Joshua Buehre	05/08/2017	0911	016	A photo of the contents of the container identified in Photograph 8.
10	Joshua Buehre	05/08/2017	0846	010	Used oil tank for used oil furnace showing that the tank is not labeled as used oil.
11	Joshua Buehre	05/08/2017	0847	011	Another view of the used oil tank identified in Photograph 10.
12	Joshua Buehre	05/08/2017	0847	012	Photograph of label placed on the used oil tank identified in Photograph 10.
13	Joshua Buehre	05/08/2017	0854	013	Lead acid batteries from maintenance of equipment that are stored in a cargo container outside of the Maintenance area.
14	Joshua Buehre	05/08/2017	0914	017	Approximately, 2-gallon container where Isopropyl Alcohol is placed at the end of each day.

Report Photo #	Photographer	Date	Approx. Time	File Name (DSC00xxx.jpg)	Description
15	Joshua Buehre	05/08/2017	0924	018	Above ground storage tank (12,000 gallon) used for equipment and fleet refueling.

PRINSCO, INC  
JESUP, IA

Photo Number: 1  
Photographer: Joshua A. Buehre  
Date: 05/08/2017  
Time: 0817  
Description: Exterior of a less than one cubic yard container for trash disposal in Production area.



Photo Number: 2  
Photographer: Joshua A. Buehre  
Date: 005/08/2017  
Time: 0817  
Description: Photo of the less than 1 cubic yard container identified in Photograph 1 that is used for trash disposal in the Production area.





PRINSCO, INC  
JESUP, IA

Photo Number: 3  
Photographer: Joshua A. Buehre  
Date: 05/08/2017  
Time: 0832  
Description: A 250-gallon used oil container located immediately adjacent to the Maintenance area.



Photo Number: 4  
Photographer: Joshua A. Buehre  
Date: 05/08/2017  
Time: 0833  
Description: Used oil container identified in Photograph 3, showing no used oil label.



PRINSCO, INC  
JESUP, IA

Photo Number: 5  
Photographer: Joshua A. Buehre  
Date: 05/08/2017  
Time: 0833  
Description: Another photograph  
of the used oil container identified in  
Photograph 3, showing no used oil label.



Photo Number: 6  
Photographer: Joshua A. Buehre  
Date: 05/08/2017  
Time: 0834  
Description: Photo of container  
identified in Photographs 3-5 showing the  
used oil label on the container.





PRINSCO, INC  
JESUP, IA

Photo Number: 7  
Photographer: Joshua A. Buehre  
Date: 05/08/2017  
Time: 0837  
Description: Parts washer located in  
the Maintenance area of the facility.



Photo Number: 8  
Photographer: Joshua A. Buehre  
Date: 05/08/2017  
Time: 0911  
Description: An oily waste rag  
container utilized for the disposal of oily  
rags from maintenance activities.

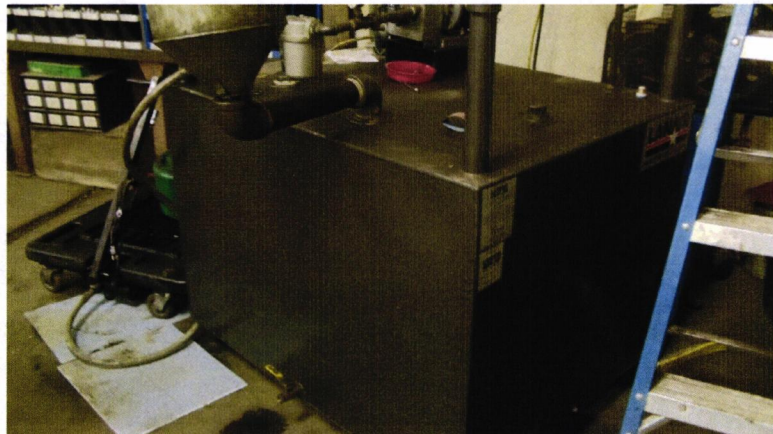


PRINSCO, INC  
JESUP, IA

Photo Number: 9  
Photographer: Joshua A. Buehre  
Date: 05/08/2017  
Time: 0911  
Description: A photo of the  
contents of the container identified in  
Photograph 8.



Photo Number: 10  
Photographer: Joshua A. Buehre  
Date: 05/08/2017  
Time: 0846  
Description: Used oil tank for used  
oil furnace showing that the tank is not  
labeled as used oil.





PRINSCO, INC  
JESUP, IA

Photo Number: 11  
Photographer: Joshua A. Buehre  
Date: 05/08/2017  
Time: 0847  
Description: Another view of the  
used oil tank identified in Photograph 10.

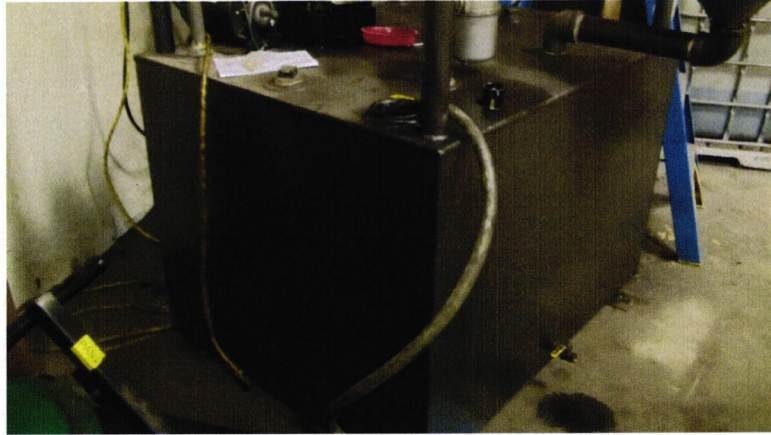
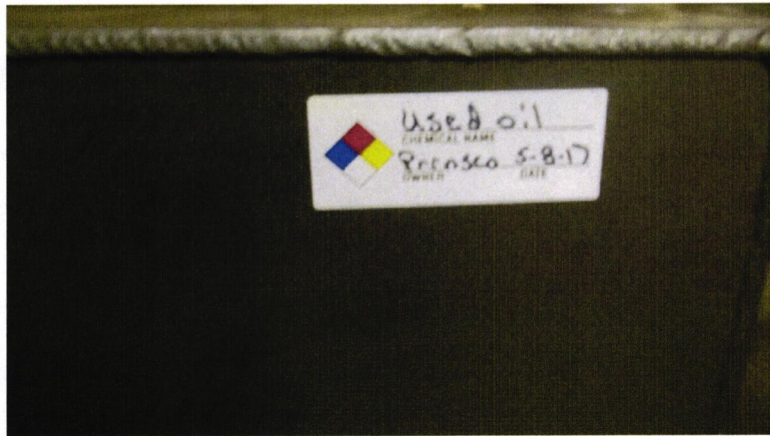


Photo Number: 12  
Photographer: Joshua A. Buehre  
Date: 05/08/2017  
Time: 0847  
Description: Photograph of label  
placed on the used oil tank identified in  
Photograph 10.



PRINSCO, INC  
JESUP, IA

Photo Number: 13  
Photographer: Joshua A. Buehre  
Date: 05/08/2017  
Time: 0854  
Description: Lead acid batteries  
from maintenance of equipment that are  
stored in a cargo container outside of the  
Maintenance area.

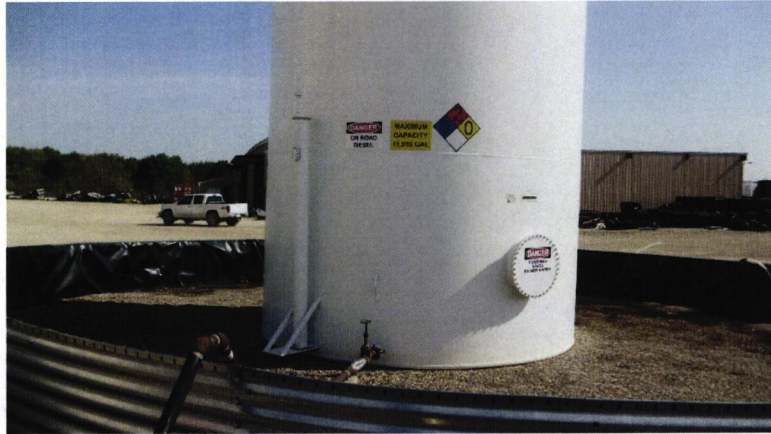


Photo Number: 14  
Photographer: Joshua A. Buehre  
Date: 05/08/2017  
Time: 0914  
Description: Approximately, 2-  
gallon container where Isopropyl Alcohol  
is placed at the end of each day.



PRINSCO, INC  
JESUP, IA

Photo Number: 15  
Photographer: Joshua A. Buehre  
Date: 05/08/2017  
Time: 0924  
Description: Above ground storage  
tank (12,000 gallon) used for equipment  
and fleet refueling.





# Hazardous Waste Site Info Verification Report for Inspector

March 6, 2017

PROCEDURES for Inspectors/Investigators/etc. performing Site Visits:

Present the Facility representative with a copy of their Site Info Verification Report (Iowa facilities only).

If during the course of the site visit, the inspector/investigator becomes aware of any changes which should be made to the information printed on this form, please make the corrections and return the form to Elizabeth Koesterer, AWMD/WEMM.

Our instructions to them are printed on their Site Info Verification Report, and should be self explanatory. If the Iowa facility wants to revise their Site Info Verification Report, they can do so and mail it back to EPA R7, or have the inspector deliver it.

If a Kansas, Missouri or Nebraska facility wants to change their information, they must fill out a RCRA Subtitle C Site Identification Form (or equivalent State form) and mail it to the appropriate State.

EPA RCRA ID Number: IAR000508150

Name of Company/Site: PRINSCO INC

Location of Site: 850 HAWKEYE RD  
JESUP, IA 50648  
BUCHANAN County

Land Type: Private

NAICS: 326122 - PLASTICS PIPE AND PIPE FITTING MANUFACTURING

Mailing Address: PO BOX 527  
JESUP, IA 50648

Site Contact: ~~DONALD G MCMULLEN~~ *Jeremy Larsen*

Job Title:  
Address: PO BOX 527  
JESUP, IA 50648  
Phone Number: 319-827-6428

Current Owner of Site: PRINSCO INC  
Owner Type: Private

Current Operator of Site: PRINSCO INC  
Operator Type: Private

TYPE(S) OF REGULATED ACTIVITY: Federal Conditionally Exempt SQG  
*20-100*  
~~Off-spec Used Oil Burner~~  
*JAB*

Date of Site Visit: 5/8/2017

Name of Inspector (Please print): Joshua Buehne

(Check one): [ ] EPA R7 ENST [ ☒ ] EPA R7 Contractor [ ] NOWCC/SEE Investigator

Signature of Inspector/Investigator: *Joshua Buehne*

# Hazardous Waste Site Info Verification Report for Inspector

March 6, 2017

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Hazardous Wastes Handled:

D001 ~~JAB~~ D002 ~~JAB~~ D027 ~~JAB~~ D028 ~~JAB~~ D039 F003 ~~JAB~~ F004 ~~JAB~~  
E005 F002

I 10/16/07 3+ N 05/07/07 2+

Certified by State/EPA

on 10/16/07 by  
JIM L LYNCH 10/16/07  
NOWCC/SEE INVESTIGATOR

Date of Site Visit: 5/8/2017

Name of Inspector (Please print): Joshua Buehve

(Check one): [ ] EPA R7 ENST [ ☒ ] EPA R7 Contractor [ ] NOWCC/SEE Investigator

Signature of Inspector/Investigator: Joshua Buehve

# SAFETY DATA SHEET



ISOPROPYL ALCOHOL

## Section 1. Identification

GHS product identifier : ISOPROPYL ALCOHOL  
Other means of identification : Not available.  
Product type : Liquid.

### Relevant identified uses of the substance or mixture and uses advised against

Not applicable.

Supplier's details : Manufacturer:  
Techspray  
8125 Cobb Center Drive  
Kennesaw, GA 30152  
Tel: 800-858-4043  
1 703-527-3887

Emergency telephone number (with hours of operation) : Chemtrec - 1-800-858-4043  
CANTUC (Canadian Transportation): (613) 996-6666  
Emergency phone: (800) 858-4043  
24/7

## Section 2. Hazards Identification

OSHA/HCS status : This material is considered hazardous by the OSHA Hazard Communication Standard (29 CFR 1910.1200).

Classification of the substance or mixture : FLAMMABLE LIQUIDS - Category 2  
SERIOUS EYE DAMAGE/ EYE IRRITATION - Category 2A  
SPECIFIC TARGET ORGAN TOXICITY (SINGLE EXPOSURE) (Narcotic effects) - Category 3

### GHS label elements

Hazard pictograms :



Signal word : Danger

Hazard statements : Highly flammable liquid and vapor.  
Causes serious eye irritation.  
May cause drowsiness and dizziness.

### Precautionary statements

Prevention : Wear protective gloves. Wear eye or face protection. Keep away from heat, hot surfaces, sparks, open flames and other ignition sources. No smoking. Use explosion-proof electrical, ventilating, lighting and all material-handling equipment. Use only non-sparking tools. Take precautionary measures against static discharge. Keep container tightly closed. Use only outdoors or in a well-ventilated area. Avoid breathing vapor. Wash hands thoroughly after handling.

Response : IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing. Call a POISON CENTER or physician if you feel unwell. IF ON SKIN (or hair): Take off immediately all contaminated clothing. Rinse skin with water or shower. IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. If eye irritation persists: Get medical attention.

Storage : Store locked up. Store in a well-ventilated place. Keep cool.



## Section 2. Hazards identification

- Disposal : Dispose of contents and container in accordance with all local, regional, national and international regulations.
- Hazards not otherwise classified : None known.

## Section 3. Composition/information on ingredients

- Substance/mixture : Substance
- Other means of identification : Not available.

### CAS number/other identifiers

- CAS number : 67-63-0
- Product code : 1610/CAN/EUR-GS, G1, G4, G, 5G, 54G

Ingredient name	%	CAS number
Isopropyl alcohol	99.6 - 100	67-63-0

Any concentration shown as a range is to protect confidentiality or is due to batch variation.

**There are no additional ingredients present which, within the current knowledge of the supplier and in the concentrations applicable, are classified as hazardous to health or the environment and hence require reporting in this section.**

**Occupational exposure limits, if available, are listed in Section 8.**

## Section 4. First aid measures

### Description of necessary first aid measures

- Eye contact** : Immediately flush eyes with plenty of water, occasionally lifting the upper and lower eyelids. Check for and remove any contact lenses. Continue to rinse for at least 10 minutes. Get medical attention.
- Inhalation** : Remove victim to fresh air and keep at rest in a position comfortable for breathing. If it is suspected that fumes are still present, the rescuer should wear an appropriate mask or self-contained breathing apparatus. If not breathing, if breathing is irregular or if respiratory arrest occurs, provide artificial respiration or oxygen by trained personnel. It may be dangerous to the person providing aid to give mouth-to-mouth resuscitation. Get medical attention. If necessary, call a poison center or physician. If unconscious, place in recovery position and get medical attention immediately. Maintain an open airway. Loosen tight clothing such as a collar, tie, belt or waistband.
- Skin contact** : Flush contaminated skin with plenty of water. Remove contaminated clothing and shoes. Get medical attention if symptoms occur. Wash clothing before reuse. Clean shoes thoroughly before reuse.
- Ingestion** : Wash out mouth with water. Remove dentures if any. Remove victim to fresh air and keep at rest in a position comfortable for breathing. If material has been swallowed and the exposed person is conscious, give small quantities of water to drink. Stop if the exposed person feels sick as vomiting may be dangerous. Do not induce vomiting unless directed to do so by medical personnel. If vomiting occurs, the head should be kept low so that vomit does not enter the lungs. Get medical attention. If necessary, call a poison center or physician. Never give anything by mouth to an unconscious person. If unconscious, place in recovery position and get medical attention immediately. Maintain an open airway. Loosen tight clothing such as a collar, tie, belt or waistband.

### Most important symptoms/effects, acute and delayed

#### Potential acute health effects

- Eye contact** : Causes serious eye irritation.
- Inhalation** : Can cause central nervous system (CNS) depression. May cause drowsiness and dizziness.
- Skin contact** : No known significant effects or critical hazards.

## Section 4. First aid measures

**Ingestion** : Can cause central nervous system (CNS) depression. Irritating to mouth, throat and stomach.

### Over-exposure signs/symptoms

**Eye contact** : Adverse symptoms may include the following:  
pain or irritation  
watering  
redness

**Inhalation** : Adverse symptoms may include the following:  
nausea or vomiting  
headache  
drowsiness/fatigue  
dizziness/vertigo  
unconsciousness

**Skin contact** : Adverse symptoms may include the following:  
irritation  
redness  
dryness  
cracking

**Ingestion** : Adverse symptoms may include the following:  
Irritating to mouth, throat and stomach.  
nausea or vomiting  
Ingestion Seek medical attention.

### Indication of immediate medical attention and special treatment needed, if necessary

**Notes to physician** : Treat symptomatically. Contact poison treatment specialist immediately if large quantities have been ingested or inhaled.

**Specific treatments** : No specific treatment.

**Protection of first-aiders** : No action shall be taken involving any personal risk or without suitable training. If it is suspected that fumes are still present, the rescuer should wear an appropriate mask or self-contained breathing apparatus. It may be dangerous to the person providing aid to give mouth-to-mouth resuscitation.

See toxicological information (Section 11)

## Section 5. Fire-fighting measures

### Extinguishing media

**Suitable extinguishing media** : Use dry chemical, CO<sub>2</sub>, water spray (fog) or foam.

**Unsuitable extinguishing media** : Do not use water jet.

**Specific hazards arising from the chemical** : Highly flammable liquid and vapor. In a fire or if heated, a pressure increase will occur and the container may burst, with the risk of a subsequent explosion. The vapor/gas is heavier than air and will spread along the ground. Vapors may accumulate in low or confined areas or travel a considerable distance to a source of ignition and flash back. Runoff to sewer may create fire or explosion hazard.

**Hazardous thermal decomposition products** : Decomposition products may include the following materials:  
carbon dioxide  
carbon monoxide

**Special protective actions for fire-fighters** : Promptly isolate the scene by removing all persons from the vicinity of the incident if there is a fire. No action shall be taken involving any personal risk or without suitable training. Move containers from fire area if this can be done without risk. Use water spray to keep fire-exposed containers cool.

**Special protective equipment for fire-fighters** : Fire-fighters should wear appropriate protective equipment and self-contained breathing apparatus (SCBA) with a full face-piece operated in positive pressure mode.



## Section 6. Accidental release measures

### Personal precautions, protective equipment and emergency procedures

- For non-emergency personnel** : No action shall be taken involving any personal risk or without suitable training. Evacuate surrounding areas. Keep unnecessary and unprotected personnel from entering. Do not touch or walk through spilled material. Shut off all ignition sources. No flames, smoking or flames in hazard area. Avoid breathing vapor or mist. Provide adequate ventilation. Wear appropriate respirator when ventilation is inadequate. Put on appropriate personal protective equipment.
- For emergency responders** : If specialised clothing is required to deal with the spillage, take note of any information in Section 8 on suitable and unsuitable materials. See also the information in "For non-emergency personnel".
- Environmental precautions** : Avoid dispersal of spilled material and runoff and contact with soil, waterways, drains and sewers. Inform the relevant authorities if the product has caused environmental pollution (sewers, waterways, soil or air).

### Methods and materials for containment and cleaning up

- Small spill** : Stop leak if without risk. Move containers from spill area. Use spark-proof tools and explosion-proof equipment. Dilute with water and mop up if water-soluble. Alternatively, or if water-insoluble, absorb with an inert dry material and place in an appropriate waste disposal container. Dispose of via a licensed waste disposal contractor.
- Large spill** : Stop leak if without risk. Move containers from spill area. Use spark-proof tools and explosion-proof equipment. Approach release from upwind. Prevent entry into sewers, water courses, basements or confined areas. Wash spillages into an effluent treatment plant or proceed as follows. Contain and collect spillage with non-combustible, absorbent material e.g. sand, earth, vermiculite or diatomaceous earth and place in container for disposal according to local regulations (see Section 13). Dispose of via a licensed waste disposal contractor. Contaminated absorbent material may pose the same hazard as the spilled product. Note: see Section 1 for emergency contact information and Section 13 for waste disposal.

## Section 7. Handling and storage

### Precautions for safe handling

- Protective measures** : Put on appropriate personal protective equipment (see Section 8). Do not ingest. Avoid contact with eyes, skin and clothing. Avoid breathing vapor or mist. Use only with adequate ventilation. Wear appropriate respirator when ventilation is inadequate. Do not enter storage areas and confined spaces unless adequately ventilated. Keep in the original container or an approved alternative made from a compatible material, kept tightly closed when not in use. Store and use away from heat, sparks, open flame or any other ignition source. Use explosion-proof electrical (ventilating, lighting and material handling) equipment. Use only non-sparking tools. Take precautionary measures against electrostatic discharges. Empty containers retain product residue and can be hazardous. Do not reuse container.
- Advice on general occupational hygiene** : Eating, drinking and smoking should be prohibited in areas where this material is handled, stored and processed. Workers should wash hands and face before eating, drinking and smoking. Remove contaminated clothing and protective equipment before entering eating areas. See also Section 8 for additional information on hygiene measures.
- Conditions for safe storage, including any incompatibilities** : Store in accordance with local regulations. Store in a segregated and approved area. Store in original container protected from direct sunlight in a dry, cool and well-ventilated area, away from incompatible materials (see Section 10) and food and drink. Store locked up. Eliminate all ignition sources. Separate from oxidizing materials. Keep container tightly closed and sealed until ready for use. Containers that have been opened must be carefully resealed and kept upright to prevent leakage. Do not store in unlabeled containers. Use appropriate containment to avoid environmental contamination.



## Section 8. Exposure controls/personal protection

### Control parameters

#### Occupational exposure limits

Ingredient name	Exposure limits
Isopropyl alcohol	<p><b>ACGIH TLV (United States, 4/2014).</b>            STEL: 400 ppm 15 minutes.            TWA: 200 ppm 8 hours.</p> <p><b>NIOSH REL (United States, 10/2013).</b>            STEL: 1225 mg/m<sup>3</sup> 15 minutes.            STEL: 500 ppm 15 minutes.            TWA: 980 mg/m<sup>3</sup> 10 hours.            TWA: 400 ppm 10 hours.</p> <p><b>OSHA PEL (United States, 2/2013).</b>            TWA: 980 mg/m<sup>3</sup> 8 hours.            TWA: 400 ppm 8 hours.</p> <p><b>OSHA PEL 1989 (United States, 3/1989).</b>            STEL: 1225 mg/m<sup>3</sup> 15 minutes.            STEL: 500 ppm 15 minutes.            TWA: 980 mg/m<sup>3</sup> 8 hours.            TWA: 400 ppm 8 hours.</p>

**Appropriate engineering controls** : Use only with adequate ventilation. Use process enclosures, local exhaust ventilation or other engineering controls to keep worker exposure to airborne contaminants below any recommended or statutory limits. The engineering controls also need to keep gas, vapor or dust concentrations below any lower explosive limits. Use explosion-proof ventilation equipment.

**Environmental exposure controls** : Emissions from ventilation or work process equipment should be checked to ensure they comply with the requirements of environmental protection legislation. In some cases, fume scrubbers, filters or engineering modifications to the process equipment will be necessary to reduce emissions to acceptable levels.

### Individual protection measures

**Hygiene measures** : Wash hands, forearms and face thoroughly after handling chemical products, before eating, smoking and using the lavatory and at the end of the working period. Appropriate techniques should be used to remove potentially contaminated clothing. Wash contaminated clothing before reusing. Ensure that eyewash stations and safety showers are close to the workstation location.

**Eye/face protection** : Safety eyewear complying with an approved standard should be used when a risk assessment indicates this is necessary to avoid exposure to liquid splashes, mists, gases or dusts. If contact is possible, the following protection should be worn, unless the assessment indicates a higher degree of protection: chemical splash goggles.

### Skin protection

**Hand protection** : Chemical-resistant, impervious gloves complying with an approved standard should be worn at all times when handling chemical products if a risk assessment indicates this is necessary. Considering the parameters specified by the glove manufacturer, check during use that the gloves are still retaining their protective properties. It should be noted that the time to breakthrough for any glove material may be different for different glove manufacturers. In the case of mixtures, consisting of several substances, the protection time of the gloves cannot be accurately estimated.

**Body protection** : Personal protective equipment for the body should be selected based on the task being performed and the risks involved and should be approved by a specialist before handling this product. When there is a risk of ignition from static electricity, wear anti-static protective clothing. For the greatest protection from static discharges, clothing should include anti-static overalls, boots and gloves.

**Other skin protection** : Appropriate footwear and any additional skin protection measures should be selected based on the task being performed and the risks involved and should be approved by a specialist before handling this product.

## Section 8. Exposure controls/personal protection

**Respiratory protection** : Use a properly fitted, air-purifying or air-fed respirator complying with an approved standard if a risk assessment indicates this is necessary. Respirator selection must be based on known or anticipated exposure levels, the hazards of the product and the safe working limits of the selected respirator.

## Section 9. Physical and chemical properties

### Appearance

**Physical state** : Liquid.  
**Color** : Clear. Colorless.  
**Odor** : Alcohol-like.  
**Odor threshold** : Not available.  
**pH** : 7  
**Melting point** : Not available.  
**Boiling point** : 82°C (179.6°F)  
**Flash point** : Closed cup: 11.7°C (53.1°F) [Tagliabue.]  
**Evaporation rate** : 1.7 (butyl acetate = 1)  
**Flammability (solid, gas)** : Highly flammable in the presence of the following materials or conditions: open flames, sparks and static discharge and heat.  
**Lower and upper explosive (flammable) limits** : Lower: 2%  
Upper: 12%  
**Vapor pressure** : Not available.  
**Vapor density** : 2.07 [Air = 1]  
**Relative density** : Not available.  
**Solubility** : Not available.  
**Partition coefficient: n-octanol/water** : Not available.  
**Auto-ignition temperature** : Not available.  
**Decomposition temperature** : Not available.  
**Viscosity** : Not available.

## Section 10. Stability and reactivity

**Reactivity** : No specific test data related to reactivity available for this product or its ingredients.

**Chemical stability** : The product is stable.

**Possibility of hazardous reactions** : Under normal conditions of storage and use, hazardous reactions will not occur.

**Conditions to avoid** : Avoid all possible sources of ignition (spark or flame). Do not pressurize, cut, weld, braze, solder, drill, grind or expose containers to heat or sources of ignition. Do not allow vapor to accumulate in low or confined areas.

**Incompatible materials** : Reactive or incompatible with the following materials:  
oxidizing materials

**Hazardous decomposition products** : Under normal conditions of storage and use, hazardous decomposition products should not be produced.



## Section 11. Toxicological information

### Information on toxicological effects

#### Acute toxicity

Product/ingredient name	Result	Species	Dose	Exposure
Isopropyl alcohol	LD50 Dermal	Rabbit	12800 mg/kg	-
	LD50 Oral	Rat	5000 mg/kg	-

#### Irritation/Corrosion

Product/ingredient name	Result	Species	Score	Exposure	Observation
Isopropyl alcohol	Eyes - Moderate irritant	Rabbit	-	24 hours 100 milligrams	-
	Eyes - Moderate irritant	Rabbit	-	10 milligrams	-
	Eyes - Severe irritant	Rabbit	-	100 milligrams	-
	Skin - Mild irritant	Rabbit	-	500 milligrams	-

#### Sensitization

Not available.

#### Mutagenicity

Not available.

#### Carcinogenicity

Not available.

#### Classification

Product/ingredient name	OSHA	IARC	NTP
Isopropyl alcohol	-	3	-

#### Reproductive toxicity

Not available.

#### Teratogenicity

Not available.

#### Specific target organ toxicity (single exposure)

Name	Category	Route of exposure	Target organs
Isopropyl alcohol	Category 3	Not applicable.	Narcotic effects

#### Specific target organ toxicity (repeated exposure)

Not available.

#### Aspiration hazard

Not available.

Information on the likely routes of exposure : Not available.

#### Potential acute health effects

- Eye contact : Causes serious eye irritation.
- Inhalation : Can cause central nervous system (CNS) depression. May cause drowsiness and dizziness.
- Skin contact : No known significant effects or critical hazards.
- Ingestion : Can cause central nervous system (CNS) depression. Irritating to mouth, throat and stomach.



## Section 11. Toxicological information

- Eye contact** : Adverse symptoms may include the following:  
pain or irritation  
watering  
redness
- Inhalation** : Adverse symptoms may include the following:  
nausea or vomiting  
headache  
drowsiness/fatigue  
dizziness/vertigo  
unconsciousness
- Skin contact** : Adverse symptoms may include the following:  
irritation  
redness  
dryness  
cracking
- Ingestion** : Adverse symptoms may include the following:  
Irritating to mouth, throat and stomach.  
nausea or vomiting  
Ingestion Seek medical attention.

### Delayed and immediate effects and also chronic effects from short and long term exposure

#### Short term exposure

- Potential immediate effects** : Not available.
- Potential delayed effects** : Not available.

#### Long term exposure

- Potential immediate effects** : Not available.
- Potential delayed effects** : Not available.

#### Potential chronic health effects

Not available.

- General** : No known significant effects or critical hazards.
- Carcinogenicity** : No known significant effects or critical hazards.
- Mutagenicity** : No known significant effects or critical hazards.
- Teratogenicity** : No known significant effects or critical hazards.
- Developmental effects** : No known significant effects or critical hazards.
- Fertility effects** : No known significant effects or critical hazards.

### Numerical measures of toxicity

#### Acute toxicity estimates

Route	ATE value
Oral	5010 mg/kg

## Section 12. Ecological information

### Toxicity

Product/ingredient name	Result	Species	Exposure
Isopropyl alcohol	Acute LC50 1400000 to 1950000 µg/l	Crustaceans - Crangon crangon	48 hours
	Marine water Acute LC50 1400000 µg/l	Fish - Gambusia affinis	96 hours

## Section 12. Ecological information

### Persistence and degradability

Not available.

### Bioaccumulative potential

Product/ingredient name	LogP <sub>ow</sub>	BCF	Potential
Isopropyl alcohol	0.05	-	low

### Mobility in soil







Soil/water partition coefficient (K<sub>oc</sub>) : Not available.

Other adverse effects : No known significant effects or critical hazards.

## Section 13. Disposal considerations

**Disposal methods** : The generation of waste should be avoided or minimized wherever possible. Disposal of this product, solutions and any by-products should at all times comply with the requirements of environmental protection and waste disposal legislation and any regional local authority requirements. Dispose of surplus and non-recyclable products via a licensed waste disposal contractor. Waste should not be disposed of untreated to the sewer unless fully compliant with the requirements of all authorities with jurisdiction. Waste packaging should be recycled. Incineration or landfill should only be considered when recycling is not feasible. This material and its container must be disposed of in a safe way. Care should be taken when handling emptied containers that have not been cleaned or rinsed out. Empty containers or liners may retain some product residues. Vapor from product residues may create a highly flammable or explosive atmosphere inside the container. Do not cut, weld or grind used containers unless they have been cleaned thoroughly internally. Avoid dispersal of spilled material and runoff and contact with soil, waterways, drains and sewers.

## Section 14. Transport information

	DOT Classification	TDG Classification	Mexico Classification	ADR/RID	IMDG	IATA
UN number	UN1219	UN1219	UN1219	UN1219	UN1219	UN1219
UN proper shipping name	ISOPROPANOL (Isopropyl alcohol)	ISOPROPANOL (Isopropyl alcohol)	Isopropyl alcohol	(Isopropyl alcohol)	ISOPROPANOL	ISOPROPANOL (Isopropyl alcohol)
Transport hazard class(es)	3 	3 	3 	3 	3 	3 
Packing group	II	II	II	II	II	II
Environmental hazards	No.	No.	No.	No.	No.	No.
Additional information	-	-	-	<u>Hazard identification number</u> UN1219	-	-

**Special precautions for user** : **Transport within user's premises:** always transport in closed containers that are upright and secure. Ensure that persons transporting the product know what to do in the event of an accident or spillage.



## Section 14. Transport information

Transport in bulk according : Not available.  
to Annex II of MARPOL  
73/78 and the IBC Code

## Section 15. Regulatory information

U.S. Federal regulations : TSCA 8(a) CDR Exempt/Partial exemption: Not determined  
All components are listed or exempted.

Clean Air Act Section 112 : Not listed

(b) Hazardous Air

Pollutants (HAPs)

Clean Air Act Section 602 : Not listed

Class I Substances

Clean Air Act Section 602 : Not listed

Class II Substances

DEA List I Chemicals : Not listed

(Precursor Chemicals)

DEA List II Chemicals : Not listed

(Essential Chemicals)

### SARA 302/304

#### Composition/information on ingredients

No products were found.

SARA 304 RQ : Not applicable.

### SARA 311/312

Classification : Fire hazard  
Immediate (acute) health hazard

#### Composition/information on ingredients

Name	%	Fire hazard	Sudden release of pressure	Reactive	Immediate (acute) health hazard	Delayed (chronic) health hazard
Isopropyl alcohol	99.6 - 100	Yes.	No.	No.	Yes.	No.

### SARA 313

	Product name	CAS number	%
Form R - Reporting requirements	Isopropyl alcohol	67-63-0	99.6 - 100
Supplier notification	Isopropyl alcohol	67-63-0	99.6 - 100

SARA 313 notifications must not be detached from the SDS and any copying and redistribution of the SDS shall include copying and redistribution of the notice attached to copies of the SDS subsequently redistributed.

### State regulations

Massachusetts : The following components are listed: ISOPROPYL ALCOHOL  
New York : None of the components are listed.  
New Jersey : The following components are listed: ISOPROPYL ALCOHOL; 2-PROPANOL  
Pennsylvania : The following components are listed: 2-PROPANOL

### International regulations

#### Chemical Weapon Convention List Schedules I, II & III Chemicals

Not listed.

#### Montreal Protocol (Annexes A, B, C, E)



## Section 15. Regulatory information

Not listed.

### Stockholm Convention on Persistent Organic Pollutants

Not listed.

### Rotterdam Convention on Prior Inform Consent (PIC)

Not listed.

### UNECE Aarhus Protocol on POPs and Heavy Metals

Not listed.

### International lists

#### National inventory

Australia	: All components are listed or exempted.
Canada	: All components are listed or exempted.
China	: All components are listed or exempted.
Europe	: All components are listed or exempted.
Japan	: All components are listed or exempted.
Malaysia	: All components are listed or exempted.
New Zealand	: All components are listed or exempted.
Philippines	: All components are listed or exempted.
Republic of Korea	: All components are listed or exempted.
Taiwan	: All components are listed or exempted.

## Section 16. Other information

### Hazardous Material Information System (U.S.A.)

Health	1
Flammability	3
Physical hazards	1

Caution: HMIS® ratings are based on a 0-4 rating scale, with 0 representing minimal hazards or risks, and 4 representing significant hazards or risks. Although HMIS® ratings are not required on SDSs under 29 CFR 1910.1200, the preparer may choose to provide them. HMIS® ratings are to be used with a fully implemented HMIS® program. HMIS® is a registered mark of the National Paint & Coatings Association (NPCA). HMIS® materials may be purchased exclusively from J. J. Keller (800) 327-6868.

The customer is responsible for determining the PPE code for this material.

### National Fire Protection Association (U.S.A.)



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Copyright ©2001, National Fire Protection Association, Quincy, MA 02269. This warning system is intended to be interpreted and applied only by properly trained individuals to identify fire, health and reactivity hazards of chemicals. The user is referred to certain limited number of chemicals with recommended classifications in NFPA 49 and NFPA 325, which would be used as a guideline only. Whether the chemicals are classified by NFPA or not, anyone using the 704 systems to classify chemicals does so at their own risk.

### History

Date of printing : 5/5/2015.

**Section 16. Other information**

Date of issue/Date of revision : 5/5/2015.

Date of previous issue : No previous validation.

Version : 1

Key to abbreviations : ATE = Acute Toxicity Estimate  
BCF = Bioconcentration Factor  
GHS = Globally Harmonized System of Classification and Labelling of Chemicals  
IATA = International Air Transport Association  
IBC = Intermediate Bulk Container  
IMDG = International Maritime Dangerous Goods  
LogPow = logarithm of the octanol/water partition coefficient  
MARPOL 73/78 = International Convention for the Prevention of Pollution From Ships, 1973 as modified by the Protocol of 1978. ("Marpol" = marine pollution)  
UN = United Nations

References : Not available.

☒ Indicates information that has changed from previously issued version.

**Notice to reader**

To the best of our knowledge, the information contained herein is accurate. However, neither the above-named supplier, nor any of its subsidiaries, assumes any liability whatsoever for the accuracy or completeness of the information contained herein.

Final determination of suitability of any material is the sole responsibility of the user. All materials may present unknown hazards and should be used with caution. Although certain hazards are described herein, we cannot guarantee that these are the only hazards that exist.



# SAFETY DATA SHEET: REGULAR MINERAL SPIRITS

IN CASE OF TRANSPORTATION EMERGENCY CONTACT:

**CHEMTREC:(800) 424-9300**

-----  
ALL OTHER INQUIRIES:

(770) 904-7042 // [www.ciscochem.com](http://www.ciscochem.com)  
266 Rue Cezzan Lavonia, GA 30553



## 1. IDENTIFICATION

CAS # 8052-41-3

### SYNONYMS:

Naphtha, stoddard solvent, mineral spirits, white spirit

### GENERIC CHEMICAL NAME:

Naphtha, high paraffinic, stoddard solvent, naphtha solvent

### PRODUCT TYPE:

Substance

## 2. HAZARDS IDENTIFICATION

APPEARANCE: COLORLESS LIQUID

ODOR: PETROLEUM SOLVENT

SIGNAL WORD: WARNING!  
FLAMMABLE LIQUID AND VAPOR  
STATIC ACCUMULATING LIQUID CAN BECOME ELECTROSTATIC ALLY  
IN BONDED AND GROUNDED EQUIPMENT; SPARKS MAY IGNITE LIQUID  
AND VAPOR MAY CAUSE FLASH FIRE  
HARMFUL IF SWALLOWED, CAN ENTER LUNGS AND CAUSE DAMAGE  
MAY CAUSE CHRONIC EFFECTS  
MAY CAUSE SKIN IRRITATION  
MAY CAUSE EYE IRRITATION  
MAY CAUSE RESPIRATORY TRACT IRRITATION  
PROLONGED SKIN CONTACT MAY CAUSE IRRITATION

EXPOSURE ROUTES: INHALATION, INGESTION, SKIN AND/OR EYE CONTACT

PHYSICAL: KEEP AWAY FROM HEAT, SPARKS AND FLAME. KEEP CONTAINER  
TIGHTLY CLOSED. USE ONLY WITH ADEQUATE VENTILATION.  
AVOID SPARK PROMOTERS. GROUND/BOND CONTAINER AND  
EQUIPMENT. THESE ALONE MAY BE INSUFFICIENT TO REMOVE  
STATIC ELECTRICITY

EYES: AVOID CONTACT WITH EYES. WASH THOROUGHLY AFTER HANDLING

**SDS: REGULAR MINERAL  
SPIRITS**

Page: 1

Attachment 9 Page 1 of 8



SKIN: AVOID CONTACT WITH SKIN AND CLOTHING. WASH THOROUGHLY AFTER HANDLING

SYMPTOMS OF OVER EXPOSURE: IRRITATION TO EYES, NOSE, THROAT; DIZZINESS; DERMATITIS; CHEMICAL PNEOMONITIS (aspiration liquid)

MEDICAL CONDITIONS AGGRAVATED BY EXPOSURE: PRE-EXISTING DISORDERS INVOLVING ANY TARGET ORGANS MENTIONED IN THIS MSDS ARE BEING AT RISK MAY BE AGGRAVATED BY OVER EXPOSURE TO THIS PRODUCT.

## CHRONIC EFFECTS:

**3. COMPOSITION**

CAS #	COMPONENT	PERCENT
8052-41-3	STODDARD SOLVENT	100

## HAZARDOUS CONSTITUENT(S) CONTAINED IN COMPLEX SUBSTANCES

CAS #	COMPONENT	PERCENT
100-41-4	ETHYL BENZENE	0.1
111-84-2	NONANE	1.0-8.0
25551-13-7	TRIMETHYL BENZENE (mixed isomers)	0.5-5.0

## Component Regulatory Information

This product may be regulated, have exposure limits or other information identified as the following: Stoddard solvent, Ethyl Benzene, Nonane, Trimethyl Benzene (See Section 8)

**4. FIRST AID MEASURES****EYES**

Check for and remove any contact lenses. Immediately flush eyes with plenty of water for at least 15 minutes, occasionally lifting the upper and lower eyelids. Get medical attention immediately.

**SKIN**

In case of contact, immediately flush skin with plenty of water for at least 15 minutes while removing contaminated clothing and shoes. Wash clothing before reuse. Clean shoes thoroughly before reuse. Get medical attention immediately.

**INHALATION:**

Move exposed person to fresh air. If not breathing, if breathing is irregular or if respiratory arrest occurs, provide artificial respiration or oxygen by trained personnel. Loosen tight clothing such as a collar, tie, belt or waistband. Get medical attention immediately.

**INGESTION:**

DO NOT INDUCE VOMITING. If conscious, rinse out mouth with water. Get medical attention immediately.

**NOTE TO PHYSICIANS**

No specific treatment. Treat symptomatically. Contact poison treatment specialist immediately if large quantities have been ingested or inhaled.

## 5. FIRE FIGHTING MEASURES

### Flammable Properties

This product is a flammable static accumulating liquid. Static accumulating liquid can become electrostatically charged even in bonded and grounded equipment. Sparks may ignite liquid and vapor may cause flash fire. Static electricity accumulation may be significantly increased by the presence of small quantities of water or other contaminants. Restrict flow velocity to avoid build-up of static charge. Refer to NFPA 77, API 2003, and CENELEC CLC/TR 50404 for further guidance.

### Extinguishing Media

Use dry chemical, CO<sub>2</sub>, water spray (FOG) or foam

### Specific Hazards Arising from Chemical

Elevated temperatures can lead to the formation of irritating fumes and vapors. Decomposition products may include the following materials: Carbon dioxide and Carbon monoxide.

### Protective Equipment and Precautions for Firefighters

Fire-fighters should wear appropriate protective equipment and self-contained breathing apparatus (SCBA) with a full face-piece operated in positive pressure mode.

## 6. ACCIDENTAL RELEASE MEASURES

### Personal Precautions

No action shall be taken involving any personal risk or without suitable training. Evacuate surrounding areas. Keep unnecessary and unprotected personnel from entering. Do not touch or walk through spilled material. Shut off all ignition sources. No flares, smoking or flames in hazard area. Avoid breathing vapor or mist. Provide adequate ventilation. Wear appropriate respirator when ventilation is inadequate. Put on appropriate personal protective equipment.

### Environmental Precautions

Avoid dispersal of spilled material and runoff and contact with soil, waterways, drains and sewers. Inform the relevant authorities if the product has caused environmental pollution.

### Methods for Containment

Stop leak if without risk.

### Methods for Cleanup

Move containers from spill area. Approach release from upwind. Absorb with an inert dry material and place in an appropriate waste disposal container. Dispose of via a licensed waste disposal contractor.

## 7. HANDLING AND STORAGE

### Handling Procedures

Eating, drinking, and smoking should be prohibited in areas where this material is handled, stored and processed. Workers should wash hands and face before eating, drinking and smoking. Remove contaminated clothing and protective equipment before entering eating areas. Do not get in eyes or on skin or clothing. Do not ingest. Avoid breathing vapor or mist. Use only with adequate ventilation. Use non-sparking tools.

### Shipping and Storing Procedures

Store in accordance with local regulations. Store in a segregated and approved area. Keep in the original container protected from direct sunlight in a dry, cool and well-ventilated area, away from incompatible materials. Do not store in unlabeled containers. Store and use away from heat, sparks, open flame or any other ignition source. Take precautionary measures against electrostatic discharges. To avoid fire or explosion, dissipate static electricity during transfer by grounding and bonding containers and equipment before transferring material. Empty containers that retain product residue may be hazardous. Do not reuse container.

## 8. EXPOSURE CONTROLS AND PERSONAL PROTECTION

### Component Exposure Limits

#### Stoddard Solvent

ACGIH TLV:	TWA:	100ppm		
OSHA PEL:	TWA:	500 ppm	TWA:	2900 mg/m <sup>3</sup>



NIOSH REL:	TWA:	N/A ppm	TWA:	350 mg/m3
NIOSH Ceiling:	1800 mg/m3 [15 minute]			
Ethyl Benzene ACGIH TLV:	TWA:	20 ppm	TWA:	N/A mg/m3
OSHA PEL:	TWA:	100 ppm	TWA:	435 mg/m3
Nonane ACGIH TLV:	TWA:	200 ppm		
Trimethyl Benzene (all isomers) ACGIH TLV:	TWA:	25 ppm		

N/A signifies not available.

#### ENGINEERING CONTROLS

This product is a static accumulating liquid. Ground/bond container and equipment. These alone may be insufficient to remove static electricity. Material should be handled in enclosed vessels and equipment. Use only in adequate ventilation. Use process enclosures, local exhaust ventilation or other engineering controls to keep worker exposure to airborne contaminants below any recommended or statutory limits.

#### EYE/FACE PROTECTION

Chemical goggles or face shield

#### SKIN PROTECTION

Chemical resistant, impervious gloves complying with an approved standard should be worn at all times. Coveralls, apron, and boots as necessary to minimize contact.

#### RESPIRATORY PROTECTION

Use a properly fitted, air-purifying or air-fed respirator complying with an approved standard if a risk assessment indicated this is necessary. Respirator selection must be based on known or anticipated exposure levels.

#### GENERAL HYGIENE

Wash hands, forearms and face thoroughly after handling chemical products, before eating, smoking and using the lavatory and at the end of the working period. Appropriate techniques should be used to remove potentially contaminated clothing.

## 9. PHYSICAL AND CHEMICAL PROPERTIES

Note: Physical and chemical properties are provided for safety, health and environmental considerations only and may not fully represent product specifications. Please see the Product Specification Sheet for further information.

Appearance:	Colorless
Odor:	Petroleum solvent
Physical State:	Liquid
Flash Point (f):	105
Boiling Point (f):	>310
Vapor Pressure (mm Hg at 20°C):	0.62
Water Soluble:	NO



Specific Gravity (g/cc): .77  
Density (lbs/gal) 6.4  
PH: Not available

## 10. STABILITY AND REACTIVITY

Stability: Stable under normal conditions. If heated, product's static accumulation will rise and could cause flash fire.

Polymerization: No polymerization

Incompatibility: Strong acids and oxidizing materials

Conditions to Avoid: High temperatures, sparks, flames

Hazardous Decomposition Products: Does not decompose at ambient temperatures

## 11. TOXICOLOGICAL INFORMATION

### Acute Exposure

Minimally toxic. Negligible hazards at ambient/normal handling temperatures.

### Respiratory Irritation

If material is misted or if vapors are generated from heating, exposure may cause irritation of mucous membranes and the upper respiratory tract. Based on data from components or similar materials.

### Eye Irritation

May cause eye irritation. Vapors formed from heating may cause eye irritation.

### Skin Irritation

May cause skin irritation

### Sensitization

Not expected to cause skin or respiratory sensitization.

### Component Analysis -- LD50 / LC50

#### Acute Toxicity Estimate (ATE) Values for Product:

Inhalation LC50 Rat 21 mg/L 1 HR  
Oral LD50 Rat >7000 mg/kg  
Dermal LD50 Rabbit >2000 mg/kg

### Chronic Exposure

### Target Organ Effects

Vapor/aerosol concentrations above recommended exposure levels are irritating to the eyes and respiratory tract, may cause headaches, dizziness, anesthesia, drowsiness, unconsciousness and other central nervous system effects including death. Prolonged or repeated direct exposure to the skin results in symptoms of irritation and redness, dermatitis or oil acne.

Small amounts of liquid aspirated into the lungs during ingestion or from vomiting may cause chemical pneumonitis or pulmonary edema.

#### Carcinogenicity

Contains Ethyl Benzene which is considered a carcinogen under IARC. It has caused cancer in laboratory animal studies. The relevance of these findings to humans is uncertain.

#### Mutagenicity

No data available to indicate product or any components present at greater than .1% are mutagenic or genotoxic.

#### Reproductive Toxicity

No data available to indicate either product or components present at greater than .1% that may cause reproductive toxicity.

#### Teratogenicity

No data available to indicate product or any components contained at greater than .1% may cause birth defects.

## 12. ECOLOGICAL INFORMATION

### Component Analysis- Ecotoxicity – Aquatic Life

#### Duration/Test/Species

96 Hr LC50

Pimephals promelas

#### Concentrations/Conditions

N/A mg/L

Degradability Not determined

Bioaccumulation Not determined

Soil Mobility Not determined

## 13. DISPOSAL CONSIDERATIONS

### Disposal Instructions

The generation of waste should be avoided or minimized wherever possible. Treatment, storage, transportation and disposal must be in accordance with applicable Federal, State/Provincial, and Local regulations.

## 14. TRANSPORT INFORMATION

EMERGENCY RESPONSE GUIDE NUMBER: 128

U.S. DOT BULK (OVER 119 GALLONS)

UN 1268, PETROLEUM DISTILLATES, N.O.S. (Naphtha solvent), 3, PG III, combustible liquid

Bulk container must be labeled on two opposing sides

U.S. DOT Non-bulk (under 119 gallons)

Not regulated.....Exempt from labeling and placarding unless shipped via Air or Vessel

\*Truck/Rail car must be placarded on all 4 sides if aggregate gross weight exceeds 1,000 pounds

## 15. REGULATORY INFORMATION

SARA Extremely Hazardous

**SDS: REGULAR MINERAL  
SPIRITS**

Page: 6

Attachment 9 Page 6 of 8

**Substances (Sections 302 & 304)**

This product does not contain greater than 1% of any "extremely hazardous substances" listed pursuant to Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA) Section 302 or Section 304 as identified in 40 CFR Part 355, Appendix A and B.

**SARA Section 313**

This product contains the following components in concentrations greater than 0.1% for carcinogenic substances and/or 1.0% of the substances subject to the reporting requirements of Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 and 40 CFR Part 372:

Ethyl Benzene (CASRN: 100-41-4): 0.1%

1,2,4 Trimethylbenzene (CASRN: 95-63-6): 2.7%

**SARA Section 311 & 312 Classifications**

Acute Hazard: NO

Chronic Hazard: YES

Fire Hazard: YES

Reactivity Hazard: NO

**CERCLA**

This product contains the following components listed under the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) in 40 CFR Part 302, Table 302.4:

Ethyl Benzene (CASRN: 100-41-4): 0.1% RQ=1,000 lbs.

**CALIFORNIA PROP 65**

- This product contains chemical(s) known to the state of California to cause cancer and/or birth defects.

**Clean Water Act / Oil Pollution Act**

This product may be subject to regulation by Section 311 of the Clean Water Act and the Oil Pollution Act. Releases of the product into or leading to surface waters must be reported to the National Response Center at 1-800-424- 8802.

**PA RIGHT TO KNOW ACT**

This product contains the following components listed under the Pennsylvania Right To Know Act:

Stoddard Solvent (CASRN: 8052-41-3)

N-Decane (CASRN: 124-18-5)

N-Nonane (CASRN: 111-84-2)

1,2,4 Trimethylbenzene (CASRN: 95-63-6)

Ethyl Benzene (CASRN: 100-41-4)

**Global Chemical Inventories****INVENTORY****COMPONENT  
ALL COMPONENTS**

US TSCA

Present\*

EU

Present

JAPAN

Not available

AUSTRALIA

Present

NEW ZEALAND

Present

CANADA

Present

SWITZERLAND

Not Available

KOREA

Present

PHILIPPINES

Present

CHINA

Present

TAIWAN

Present

\*May be subject to TSCA 12b export notification. Contains Nonane (CASRN: 111-84-2) at 7.85%.



**16. OTHER INFORMATION****US NFPA Ratings****HEALTH****1****FIRE****2****INSTABILITY****0****HIMIS RATINGS****HEALTH****1\*****FIRE****2****PHYSICAL HAZARDS****0****Precautionary Labels****Signal Word****WARNING!**

Flammable liquid and vapor

Static accumulating liquid can become electrostatically charged even in bonded and grounded equipment; Sparks may ignite liquid and vapor may cause flash fire

Harmful if swallowed, can enter lungs and cause damage

May cause chronic effects

May cause skin irritation

May cause eye irritation

May cause respiratory tract irritation

Prolonged skin contact may cause irritation

The information provided on this MSDS is correct to the best of our knowledge, information and belief at the date of its publication. The information given is designed only as a guide for safe handling, use, processing, storage, transportation, disposal and release and is not to be considered as a warranty or quality specification. The information relates only to the specific material designated and may not be valid for such material used in combination with any other material or in any process, unless specified in the text.

Date Created: 4/7/2015

Date Updated: 4/7/2015



# SAFETY DATA SHEET

## 1. Identification

**Product identifier** Brakleen® Brake Parts Cleaner

**Other means of identification**

**Product code** 05089

**Recommended use** Brake cleaner

**Recommended restrictions** None known.

**Manufacturer/Importer/Supplier/Distributor information**

**Company name** CRC Industries, Inc.

**Address** 885 Louis Dr.  
Warminster, PA 18974 US

**Telephone**

**General Information** 215-674-4300

**Technical Assistance** 800-521-3168

**Customer Service** 800-272-4620

**24-Hour Emergency (CHEMTREC)** 800-424-9300 (US)  
703-527-3887 (International)

**Website** www.crcindustries.com

## 2. Hazard(s) identification

**Physical hazards** Gases under pressure Compressed gas

**Health hazards** Skin corrosion/irritation Category 2

Serious eye damage/eye irritation Category 2B

Sensitization, skin Category 1B

Carcinogenicity Category 1B

Specific target organ toxicity, single exposure Category 3 narcotic effects

**Environmental hazards** Hazardous to the aquatic environment, acute hazard Category 2

Hazardous to the aquatic environment, long-term hazard Category 2

**OSHA defined hazards** Not classified.

**Label elements**



**Signal word** Danger

**Hazard statement** Contains gas under pressure; may explode if heated. Causes skin irritation. May cause an allergic skin reaction. Causes eye irritation. May cause drowsiness or dizziness. May cause cancer. Toxic to aquatic life. Toxic to aquatic life with long lasting effects.

**Precautionary statement**  
**Prevention**

Obtain special instructions before use. Do not handle until all safety precautions have been read and understood. Do not puncture or incinerate container. Do not expose to heat or store at temperatures above 49°C/120°F. Use with adequate ventilation. Open doors and windows or use other means to ensure a fresh air supply during use and while product is drying. If you experience any symptoms listed on this label, increase ventilation or leave the area. Avoid breathing mist or vapor. Contaminated work clothing must not be allowed out of the workplace. Wear protective gloves/protective clothing/eye protection/face protection. Wash thoroughly after handling. Avoid release to the environment.



<b>Response</b>	If on skin: Wash with plenty of water. If skin irritation or rash occurs: Get medical advice/attention. Take off contaminated clothing and wash before reuse. If inhaled: Remove person to fresh air and keep comfortable for breathing. Call a poison center/doctor if you feel unwell. If in eyes: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. If eye irritation persists: Get medical advice/attention. IF exposed or concerned: Get medical advice/attention. Collect spillage.
<b>Storage</b>	Store locked up. Protect from sunlight. Store in a well-ventilated place. Exposure to high temperature may cause can to burst.
<b>Disposal</b>	Dispose of contents/container in accordance with local/regional/national regulations.
<b>Hazard(s) not otherwise classified (HNOC)</b>	None known.
<b>Supplemental information</b>	When exposed to extreme heat or hot surfaces, vapors may decompose to harmful or fatal corrosive gases such as hydrogen chloride and possibly phosgene.

### 3. Composition/information on ingredients

#### Mixtures

Chemical name	Common name and synonyms	CAS number	%
tetrachloroethylene	perchloroethylene	127-18-4	90 - 100
carbon dioxide		124-38-9	1 - 5

Specific chemical identity and/or percentage of composition has been withheld as a trade secret.

### 4. First-aid measures

<b>Inhalation</b>	Remove victim to fresh air and keep at rest in a position comfortable for breathing. Call a POISON CENTER or doctor/physician if you feel unwell.
<b>Skin contact</b>	Remove contaminated clothing immediately and wash skin with soap and water. In case of eczema or other skin disorders: Seek medical attention and take along these instructions. If skin irritation or rash occurs: Get medical advice/attention.
<b>Eye contact</b>	Immediately flush eyes with plenty of water for at least 15 minutes. Remove contact lenses, if present and easy to do. Continue rinsing. If eye irritation persists: Get medical advice/attention.
<b>Ingestion</b>	In the unlikely event of swallowing contact a physician or poison control center. Rinse mouth. Get medical attention if symptoms occur.
<b>Most important symptoms/effects, acute and delayed</b>	May cause drowsiness and dizziness. Headache. Nausea, vomiting. Irritation of eyes and mucous membranes. Exposed individuals may experience eye tearing, redness, and discomfort. Irritation of nose and throat. Skin irritation. May cause redness and pain. May cause an allergic skin reaction. Dermatitis. Rash.
<b>Indication of immediate medical attention and special treatment needed</b>	Provide general supportive measures and treat symptomatically. Keep victim under observation. Symptoms may be delayed.
<b>General information</b>	IF exposed or concerned: Get medical advice/attention. Ensure that medical personnel are aware of the material(s) involved, and take precautions to protect themselves. Wash contaminated clothing before reuse.

### 5. Fire-fighting measures

<b>Suitable extinguishing media</b>	Water fog. Foam. Dry chemical powder. Dry chemical, CO2, or water spray.
<b>Unsuitable extinguishing media</b>	Do not use water jet as an extinguisher, as this will spread the fire.
<b>Specific hazards arising from the chemical</b>	Contents under pressure. Pressurized container may rupture when exposed to heat or flame. During fire, gases hazardous to health may be formed. When exposed to extreme heat or hot surfaces, vapors may decompose to harmful or fatal corrosive gases such as hydrogen chloride and possibly phosgene.
<b>Special protective equipment and precautions for firefighters</b>	Firefighters must use standard protective equipment including flame retardant coat, helmet with face shield, gloves, rubber boots, and in enclosed spaces, SCBA.
<b>Fire-fighting equipment/instructions</b>	In case of fire: Stop leak if safe to do so. Move containers from fire area if you can do so without risk. Containers should be cooled with water to prevent vapor pressure build up.
<b>General fire hazards</b>	Contents under pressure. Pressurized container may rupture when exposed to heat or flame.



## 6. Accidental release measures

### Personal precautions, protective equipment and emergency procedures

Keep unnecessary personnel away. Keep people away from and upwind of spill/leak. Keep out of low areas. Many gases are heavier than air and will spread along ground and collect in low or confined areas (sewers, basements, tanks). Wear appropriate protective equipment and clothing during clean-up. Avoid breathing mist or vapor. Emergency personnel need self-contained breathing equipment. Do not touch damaged containers or spilled material unless wearing appropriate protective clothing. Ventilate closed spaces before entering them. Local authorities should be advised if significant spillages cannot be contained. For personal protection, see section 8 of the SDS.

### Methods and materials for containment and cleaning up

Eliminate all ignition sources (no smoking, flares, sparks, or flames in immediate area). Keep combustibles (wood, paper, oil, etc.) away from spilled material. Collect spillage. This material is classified as a water pollutant under the Clean Water Act and should be prevented from contaminating soil or from entering sewage and drainage systems which lead to waterways. Stop the flow of material, if this is without risk. Wipe up with absorbent material (e.g. cloth, fleece). Clean surface thoroughly to remove residual contamination. Put material in suitable, covered, labeled containers. For waste disposal, see section 13 of the SDS.

### Environmental precautions

Avoid release to the environment. Inform appropriate managerial or supervisory personnel of all environmental releases. Prevent further leakage or spillage if safe to do so. Do not contaminate water. Avoid discharge into drains, water courses or onto the ground.

## 7. Handling and storage

### Precautions for safe handling

Obtain special instructions before use. Do not handle until all safety precautions have been read and understood. Pressurized container: Do not pierce or burn, even after use. Use with adequate ventilation. Open doors and windows or use other means to ensure a fresh air supply during use and while product is drying. If you experience any symptoms listed on this label, increase ventilation or leave the area. Do not use if spray button is missing or defective. Do not spray on a naked flame or any other incandescent material. Do not smoke while using or until sprayed surface is thoroughly dry. Do not cut, weld, solder, drill, grind, or expose containers to heat, flame, sparks, or other sources of ignition. Use caution around energized equipment. The metal container will conduct electricity if it contacts a live source. This may result in injury to the user from electrical shock and/or flash fire. Avoid breathing mist or vapor. Avoid contact with eyes, skin, and clothing. Avoid prolonged exposure. Should be handled in closed systems, if possible. Use only in well-ventilated areas. Wear appropriate personal protective equipment. Avoid release to the environment. Do not empty into drains. Observe good industrial hygiene practices. For product usage instructions, please see the product label.

### Conditions for safe storage, including any incompatibilities

Level 1 Aerosol.

Contents under pressure. Do not handle or store near an open flame, heat or other sources of ignition. Do not puncture or incinerate container. Do not expose to heat or store at temperatures above 49 °C/120 °F. Protect from sunlight. Store in a well-ventilated place. Store in cool place. Exposure to high temperature may cause can to burst. Store away from incompatible materials (see Section 10 of the SDS).

## 8. Exposure controls/personal protection

### Occupational exposure limits

The following constituents are the only constituents of the product which have a PEL, TLV or other recommended exposure limit. At this time, the other constituents have no known exposure limits.

#### US. OSHA Table Z-1 Limits for Air Contaminants (29 CFR 1910.1000)

Components	Type	Value
carbon dioxide (CAS 124-38-9)	PEL	9000 mg/m3
		5000 ppm

#### US. OSHA Table Z-2 (29 CFR 1910.1000)

Components	Type	Value
tetrachloroethylene (CAS 127-18-4)	Ceiling	200 ppm
	TWA	100 ppm

#### US. ACGIH Threshold Limit Values

Components	Type	Value
carbon dioxide (CAS 124-38-9)	STEL	30000 ppm
	TWA	5000 ppm

**US. ACGIH Threshold Limit Values**

Components	Type	Value
tetrachloroethylene (CAS 127-18-4)	STEL	100 ppm
	TWA	25 ppm

**US. NIOSH: Pocket Guide to Chemical Hazards**

Components	Type	Value
carbon dioxide (CAS 124-38-9)	STEL	54000 mg/m <sup>3</sup>
	TWA	30000 ppm 9000 mg/m <sup>3</sup> 5000 ppm

**Biological limit values****ACGIH Biological Exposure Indices**

Components	Value	Determinant	Specimen	Sampling Time
tetrachloroethylene (CAS 127-18-4)	0.5 mg/l	Tetrachloroethylene	Blood	*
	3 ppm	Tetrachloroethylene	End-exhaled air	*

\* - For sampling details, please see the source document.

**Exposure guidelines****US - Minnesota Haz Subs: Skin designation applies**

tetrachloroethylene (CAS 127-18-4)

Skin designation applies.

**Appropriate engineering controls**

Good general ventilation (typically 10 air changes per hour) should be used. Ventilation rates should be matched to conditions. If applicable, use process enclosures, local exhaust ventilation, or other engineering controls to maintain airborne levels below recommended exposure limits. If exposure limits have not been established, maintain airborne levels to an acceptable level. Eye wash facilities and emergency shower should be available when handling this product. Provide eyewash station.

**Individual protection measures, such as personal protective equipment****Eye/face protection**

Wear safety glasses with side shields (or goggles).

**Skin protection****Hand protection**

Wear protective gloves such as: Nitrile. Viton/butyl. Polyvinyl alcohol (PVA). Silver Shield®

**Other**

Wear appropriate chemical resistant clothing.

**Respiratory protection**

If engineering controls are not feasible or if exposure exceeds the applicable exposure limits, use a NIOSH-approved cartridge respirator with an organic vapor cartridge. Use a self-contained breathing apparatus in confined spaces and for emergencies. Air monitoring is needed to determine actual employee exposure levels.

**Thermal hazards**

Wear appropriate thermal protective clothing, when necessary.

**General hygiene considerations**

Observe any medical surveillance requirements. When using do not smoke. Always observe good personal hygiene measures, such as washing after handling the material and before eating, drinking, and/or smoking. Routinely wash work clothing and protective equipment to remove contaminants. Contaminated work clothing should not be allowed out of the workplace.

**9. Physical and chemical properties****Appearance****Physical state**

Liquid.

**Form**

Aerosol.

**Color**

Colorless.

**Odor**

Irritating.

**Odor threshold**

50 ppm

**pH**

Not available.

**Melting point/freezing point**

-8.1 °F (-22.3 °C) estimated

**Initial boiling point and boiling range**

250.3 °F (121.3 °C) estimated

**Flash point**

None (Tag Closed Cup)



Evaporation rate	Very fast.
Flammability (solid, gas)	Not available.
<b>Upper/lower flammability or explosive limits</b>	
Flammability limit - lower (%)	Not available.
Flammability limit - upper (%)	Not available.
Vapor pressure	1264.5 hPa estimated
Vapor density	5.76 (air = 1)
Relative density	1.62
Solubility (water)	0.02 % (77 °F (25 °C))
Partition coefficient (n-octanol/water)	Not available.
Auto-ignition temperature	Not available.
Decomposition temperature	Not available.
Viscosity (kinematic)	Not available.
Percent volatile	97.8 % estimated
<b>Other information</b>	
Partition coefficient (oil/water)	2.88

## 10. Stability and reactivity

Reactivity	The product is stable and non-reactive under normal conditions of use, storage and transport.
Chemical stability	Material is stable under normal conditions.
Possibility of hazardous reactions	No dangerous reaction known under conditions of normal use.
Conditions to avoid	Heat, flames and sparks. Contact with incompatible materials. When exposed to extreme heat or hot surfaces, vapors may decompose to harmful or fatal corrosive gases such as hydrogen chloride and possibly phosgene.
Incompatible materials	Strong oxidizing agents. Strong acids. Strong bases.
Hazardous decomposition products	Hydrogen chloride. Trace amounts of chlorine and phosgene. Carbon oxides. Halogenated materials. Carbonyl halides.

## 11. Toxicological information

### Information on likely routes of exposure

Inhalation	Prolonged inhalation may be harmful. May cause drowsiness and dizziness. Headache. Nausea, vomiting.
Skin contact	Causes skin irritation. May cause an allergic skin reaction.
Eye contact	Causes eye irritation.
Ingestion	Ingestion of large amounts may produce gastrointestinal disturbances including irritation, nausea, and diarrhea.

Symptoms related to the physical, chemical and toxicological characteristics	May cause drowsiness and dizziness. Headache. Nausea, vomiting. Irritation of eyes and mucous membranes. Exposed individuals may experience eye tearing, redness, and discomfort. Irritation of nose and throat. Skin irritation. May cause redness and pain. May cause an allergic skin reaction. Dermatitis. Rash.
------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

### Information on toxicological effects

Acute toxicity	None known.
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Components	Species	Test Results
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tetrachloroethylene (CAS 127-18-4)

#### Acute

#### Dermal

LD50

Rabbit

> 3228 mg/kg



Components	Species	Test Results
Oral LD50	Rat	2629 mg/kg
* Estimates for product may be based on additional component data not shown.		
Skin corrosion/irritation	Causes skin irritation.	
Serious eye damage/eye irritation	Causes eye irritation.	
Respiratory sensitization	Not a respiratory sensitizer.	
Skin sensitization	May cause an allergic skin reaction.	
Germ cell mutagenicity	No data available to indicate product or any components present at greater than 0.1% are mutagenic or genotoxic.	
Carcinogenicity	May cause cancer.	
IARC Monographs. Overall Evaluation of Carcinogenicity		
tetrachloroethylene (CAS 127-18-4)	2A Probably carcinogenic to humans.	
US. National Toxicology Program (NTP) Report on Carcinogens		
tetrachloroethylene (CAS 127-18-4)	Reasonably Anticipated to be a Human Carcinogen.	
US. OSHA Specifically Regulated Substances (29 CFR 1910.1001-1050)		
Not regulated.		
Reproductive toxicity	This product is not expected to cause reproductive or developmental effects.	
Specific target organ toxicity - single exposure	May cause drowsiness and dizziness.	
Specific target organ toxicity - repeated exposure	Not classified.	
Aspiration hazard	Not an aspiration hazard.	
Chronic effects	Prolonged inhalation may be harmful. Prolonged exposure may cause chronic effects.	

## 12. Ecological information

**Ecotoxicity** Toxic to aquatic life with long lasting effects. Accumulation in aquatic organisms is expected.

Components	Species	Test Results
tetrachloroethylene (CAS 127-18-4)		
<b>Aquatic</b>		
Fish	LC50 Rainbow trout, donaldson trout (Oncorhynchus mykiss)	4.73 - 5.27 mg/l, 96 hours

\* Estimates for product may be based on additional component data not shown.

**Persistence and degradability** No data is available on the degradability of this product.

### Bioaccumulative potential

<b>Partition coefficient n-octanol / water (log Kow)</b>	
tetrachloroethylene	2.88

**Mobility in soil** No data available.

**Other adverse effects** No other adverse environmental effects (e.g. ozone depletion, photochemical ozone creation potential, endocrine disruption, global warming potential) are expected from this component.

## 13. Disposal considerations

**Disposal of waste from residues / unused products** This material and its container must be disposed of as hazardous waste. Consult authorities before disposal. Contents under pressure. Do not puncture, incinerate or crush. Do not allow this material to drain into sewers/water supplies. Do not contaminate ponds, waterways or ditches with chemical or used container. Dispose in accordance with all applicable regulations.

**Hazardous waste code**  
D039: Waste Tetrachloroethylene  
F001: Waste Halogenated Solvent - Spent Halogenated Solvent Used in Degreasing  
F002: Waste Halogenated Solvent - Spent Halogenated Solvent

### US RCRA Hazardous Waste U List: Reference

tetrachloroethylene (CAS 127-18-4)	U210
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**Contaminated packaging**

Since emptied containers may retain product residue, follow label warnings even after container is emptied. Empty containers should be taken to an approved waste handling site for recycling or disposal.

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**14. Transport information****DOT**

UN number	UN1950
UN proper shipping name	Aerosols, poison, Limited Quantity
Transport hazard class(es)	
Class	2.2
Subsidiary risk	6.1(PGIII)
Label(s)	2.2, 6.1
Packing group	Not applicable.
Special precautions for user	Read safety instructions, SDS and emergency procedures before handling.
Packaging exceptions	306
Packaging non bulk	None
Packaging bulk	None

**IATA**

UN number	UN1950
UN proper shipping name	Aerosols, non-flammable, containing substances in Division 6.1, Packing Group III
Transport hazard class(es)	
Class	2.2
Subsidiary risk	6.1
Packing group	Not applicable.
ERG Code	2P
Special precautions for user	Read safety instructions, SDS and emergency procedures before handling.
Other information	
Passenger and cargo aircraft	Allowed with restrictions.
Cargo aircraft only	Allowed with restrictions.

**IMDG**

UN number	UN1950
UN proper shipping name	AEROSOLS
Transport hazard class(es)	
Class	2
Subsidiary risk	6.1
Packing group	Not applicable.
Environmental hazards	
Marine pollutant	No.
EmS	Not available.
Special precautions for user	Read safety instructions, SDS and emergency procedures before handling.

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**15. Regulatory information**

**US federal regulations** This product is a "Hazardous Chemical" as defined by the OSHA Hazard Communication Standard, 29 CFR 1910.1200.

**TSCA Section 12(b) Export Notification (40 CFR 707, Subpt. D)**  
Not regulated.

**SARA 304 Emergency release notification**  
Not regulated.

**US. OSHA Specifically Regulated Substances (29 CFR 1910.1001-1050)**  
Not regulated.

**US EPCRA (SARA Title III) Section 313 - Toxic Chemical: Listed substance**  
tetrachloroethylene (CAS 127-18-4)

**CERCLA Hazardous Substance List (40 CFR 302.4)**  
tetrachloroethylene (CAS 127-18-4) Listed.

**CERCLA Hazardous Substances: Reportable quantity**  
tetrachloroethylene (CAS 127-18-4) 100 LBS

Spills or releases resulting in the loss of any ingredient at or above its RQ require immediate notification to the National Response Center (800-424-8802) and to your Local Emergency Planning Committee.



**Clean Air Act (CAA) Section 112 Hazardous Air Pollutants (HAPs) List**

tetrachloroethylene (CAS 127-18-4)

**Clean Air Act (CAA) Section 112(r) Accidental Release Prevention (40 CFR 68.130)**

Not regulated.

**Safe Drinking Water Act (SDWA)** Not regulated.**Food and Drug Administration (FDA)** Not regulated.**Superfund Amendments and Reauthorization Act of 1986 (SARA)****Section 311/312** Immediate Hazard - Yes  
**Hazard categories** Delayed Hazard - Yes  
Fire Hazard - No  
Pressure Hazard - Yes  
Reactivity Hazard - No**SARA 302 Extremely hazardous substance** No**US state regulations****US. California. Candidate Chemicals List. Safer Consumer Products Regulations (Cal. Code Regs, tit. 22, 69502.3, subd. (a))**

tetrachloroethylene (CAS 127-18-4)

**US. New Jersey Worker and Community Right-to-Know Act**

carbon dioxide (CAS 124-38-9)

tetrachloroethylene (CAS 127-18-4)

**US. Massachusetts RTK - Substance List**

carbon dioxide (CAS 124-38-9)

tetrachloroethylene (CAS 127-18-4)

**US. Pennsylvania Worker and Community Right-to-Know Law**

carbon dioxide (CAS 124-38-9)

tetrachloroethylene (CAS 127-18-4)

**US. Rhode Island RTK**

carbon dioxide (CAS 124-38-9)

tetrachloroethylene (CAS 127-18-4)

**US. California Proposition 65**

WARNING: This product contains a chemical known to the State of California to cause cancer.

**US - California Proposition 65 - CRT: Listed date/Carcinogenic substance**

tetrachloroethylene (CAS 127-18-4)

Listed: April 1, 1988

**Volatile organic compounds (VOC) regulations****EPA****VOC content (40 CFR 51.100(s))** 0 %**Consumer products (40 CFR 59, Subpt. C)** Not regulated**State****Consumer products** This product is regulated as a Brake Cleaner. This product is not compliant to be sold for use in California and New Jersey. This product is compliant in all other states.**VOC content (CA)** 0 %**VOC content (OTC)** 0 %**International Inventories**

Country(s) or region	Inventory name	On inventory (yes/no)*
Australia	Australian Inventory of Chemical Substances (AICS)	Yes
Canada	Domestic Substances List (DSL)	Yes
Canada	Non-Domestic Substances List (NDSL)	No
China	Inventory of Existing Chemical Substances in China (IECSC)	Yes
Europe	European Inventory of Existing Commercial Chemical Substances (EINECS)	Yes
Europe	European List of Notified Chemical Substances (ELINCS)	No



Country(s) or region	Inventory name	On inventory (yes/no)*
Japan	Inventory of Existing and New Chemical Substances (ENCS)	Yes
Korea	Existing Chemicals List (ECL)	Yes
New Zealand	New Zealand Inventory	Yes
Philippines	Philippine Inventory of Chemicals and Chemical Substances (PICCS)	Yes
United States & Puerto Rico	Toxic Substances Control Act (TSCA) Inventory	Yes

\*A "Yes" indicates that all components of this product comply with the inventory requirements administered by the governing country(s)

A "No" indicates that one or more components of the product are not listed or exempt from listing on the inventory administered by the governing country(s).

## 16. Other information, including date of preparation or last revision

Issue date	12-20-2013
Revision date	04-27-2017
Prepared by	Allison Cho
Version #	04
Further information	CRC # 491G
HMIS® ratings	Health: 2* Flammability: 0 Physical hazard: 0 Personal protection: B
NFPA ratings	Health: 2 Flammability: 0 Instability: 0

NFPA ratings



### Disclaimer

The information contained in this document applies to this specific material as supplied. It may not be valid for this material if it is used in combination with any other materials. This information is accurate to the best of CRC's knowledge or obtained from sources believed by CRC to be accurate. Before using any product, read all warnings and directions on the label. For further clarification of any information contained on this (M)SDS consult your supervisor, a health & safety professional, or CRC Industries, Inc..

### Revision Information

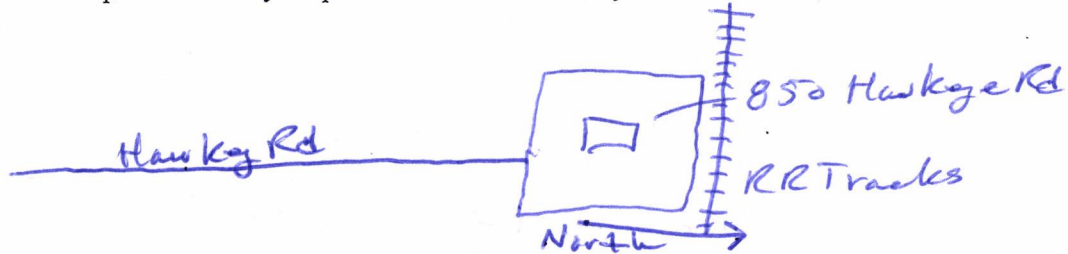
This document has undergone significant changes and should be reviewed in its entirety.

## Appendix 1-3

Facility: Prisco, Inc. Date: 5/8/2017 Arrival time: 7:46 am

DRIVE-BY

1. Drive-by conducted from public right-of-way? ☒ Yes ☐ No
2. Determine the direction "North" with respect to the facility and provide a brief sketch of the layout and orientation (as can be viewed from the public right-of-way):



3. Obvious concerns visible from public right-of-way (photos)? ☐ Yes ☐ No
- |                    |                    |                        |                       |
|--------------------|--------------------|------------------------|-----------------------|
| - Containers       | - Tanks            | - Processing Equipment | - Loading Areas       |
| - Unloading Areas  | - Security Devices | - Open Drums           | - Stressed Vegetation |
| - Unusual Staining | - Unusual Odors    | - Obvious Discharges   | - Improper Disposal   |
| - Safety Concerns  | - Other Concerns   |                        |                       |

## Appendix 1-4

SITE ENTRY AND INBRIEFING

1. ☒ Used main entrance ☒ Entered during normal operating hours ☐ Excessive delays (>15 minutes - denial of access?) - ☒ No

2. Facility Representative(s): Jeremy Larsen Title: Plant Manager

\_\_\_\_\_ Title: \_\_\_\_\_

\_\_\_\_\_ Title: \_\_\_\_\_

3. Does representative have intimate knowledge of all waste management practices? ☒ Yes ☐ No

How long in position? 4 yrs

## 4. Introduction:

- ☒ Presented credentials
- ☒ Explained responsibility to provide accurate information and provided copies of Section 1001 and 1002 U.S.C. to facility
- ☒ Verified presence at correct facility (checked address/I.D. #)
- ☒ Explained authority to conduct inspection (Section 3007 of RCRA)
- ☒ Explained the purpose, scope, and order of the inspection
- ☒ Completed Multimedia screening checklist
- ☒ Explained documentation process - worksheets, checklists, photos, notes, statements, etc
- ☒ Provided SBRFA
- ☐ Obtained GPS reading
- ☒ Explained facility's right to claim CBI

5. Was full access granted? ☒ Yes ☒ By facility representative or Other (name): Jeremy Larsen
- ☐ No - Access denied. Name of person denying access: \_\_\_\_\_

Time of denial: \_\_\_\_\_

Reason for denial, or limitations placed on access:



## Appendix 1-5

## FACILITY BACKGROUND WORKSHEET

## 1. Site History:

Date facility began operating: 1979 Number of employees: 60  
 Number of shifts/hour worked: 3 shifts Number of days worked per week: 5 days - occasionally 6  
 Size (sq. ft., how divided): 95,000 under roof

Property owner and facility operator the same? ☒ Yes ☐ No

2. Major products or services provided: HDPE Bead Resin

3. Major raw materials used: HDPE Bead Resin (solid)

4. Major manufacturing or processing operations which generate waste streams: (provide brief description)

Operation/Process

Waste Stream(s)

*See Generator Waste Stream worksheets*

*JAB*

5. Complete a Generator Waste Stream Worksheet and/or Off-Site Waste Stream Worksheet for the waste streams noted above and then finish this form.

6. Verified/compared above information with facility Notification Form: ☒ Yes ☐ No

updated contact name, removed D002, D027, D028,  
F003, F004, F005 and added F002

7. **GENERATOR STATUS:** (based on records review)

☐ Non-generator

☒ CE (0-100kg/mo or 1 kg/mo acute waste and accumulate <1000 kg or 1kg acute waste or 100 kg of acute spill residue)

☐ SQG (100-1000kg/mo and accumulate <6000kg)

☐ LQG (>1000kg/mo)

Is facility's status solidly within above category?  
(If not carefully verify status and document)

☒ Yes ☐ No

8. **TSD STATUS:**

☐ Treatment

☐ Storage

☐ Disposal

Note: Types of units, number of units, capacities, processes, etc:

JAB

9. Resolved questions from Pre-Inspection Worksheet?

☐ Yes

☐ No

☒ No Questions

10. Resolved compliance officer's questions from Pre-Inspection Worksheet?

☐ Yes

☐ No

☒ No Questions

11. Requested site map or diagram to identify all observations?

☒ Yes

☐ None Available



## Appendix 1-6

## GENERATOR WASTE STREAM WORKSHEET

1. WASTE STREAM: waste Isopropyl Alcohol  
 FACILITY DETERMINATION: ☒ Hazardous ☐ Non-hazardous ☐ Not done ☐ Inadequate  
 WASTE CODES: D001  
 DETERMINATION METHOD: ☒ Product knowledge ☐ Process knowledge ☐ Testing  
 Documentation: MSDS  
 GENERATING PROCESS: laboratory density testing  
 GENERATION RATE: 1 gallon / mo -  
 ON-SITE MANAGEMENT: Satellites ☐ Visually inspected Storage ☐ Visually inspected  
Placed in open container and allowed to evaporate  
 OFF-SITE MANAGEMENT/DISPOSITION: None
2. WASTE STREAM: spent parts washer solvent  
 FACILITY DETERMINATION: ☒ Hazardous ☐ Non-hazardous ☐ Not done ☐ Inadequate  
 WASTE CODES: D001  
 DETERMINATION METHOD: ☒ Product knowledge ☐ Process knowledge ☐ Testing  
 Documentation: MSDS  
 GENERATING PROCESS: Parts washer change-out when dirty  
 GENERATION RATE: 160 pounds / year  
 ON-SITE MANAGEMENT: Satellites ☐ Visually inspected Storage ☐ Visually inspected  
Placed in used oil storage container for burning  
in used oil furnace  
 OFF-SITE MANAGEMENT/DISPOSITION: None
3. WASTE STREAM: Used Rags  
 FACILITY DETERMINATION: ☒ Hazardous ☐ Non-hazardous ☐ Not done ☐ Inadequate  
 WASTE CODES: F002, D039  
 DETERMINATION METHOD: ☒ Product knowledge ☐ Process knowledge ☐ Testing  
 Documentation: MSDS  
 GENERATING PROCESS: cleaning of parts w/ brake cleaner  
 GENERATION RATE: 25 pounds of rags / mo  
 ON-SITE MANAGEMENT: Satellites ☐ Visually inspected Storage ☐ Visually inspected  
Disposed of in General Refuse  
 OFF-SITE MANAGEMENT/DISPOSITION: Black County Land Fill  
Frank



## Appendix 1-6

## GENERATOR WASTE STREAM WORKSHEET

4-JAB  
1. WASTE STREAM: Aerosol can waste

FACILITY DETERMINATION: ☒ Hazardous ☐ Non-hazardous ☐ Not done ☐ Inadequate

WASTE CODES: D039

DETERMINATION METHOD: ☒ Product knowledge ☐ Process knowledge ☐ Testing

Documentation: MSDS

GENERATING PROCESS: spent cans of Brake cleaner contains Tetrachloroethylene

GENERATION RATE: 2-3 cans/mo - less than 1 pound

ON-SITE MANAGEMENT: Satellites ☐ Visually inspected ☐ Storage ☐ Visually inspected ☐

Disposed of with general refuse

OFF-SITE MANAGEMENT/DISPOSITION: Blackhawk county landfill

5-JAB  
2. WASTE STREAM: Used oil

FACILITY DETERMINATION: ☐ Hazardous ☒ Non-hazardous ☐ Not done ☐ Inadequate

WASTE CODES: None

DETERMINATION METHOD: ☐ Product knowledge ☒ Process knowledge ☐ Testing

Documentation: \_\_\_\_\_

GENERATING PROCESS: change oil in fleet trucks, fork trucks & Gen. boxes of equip

GENERATION RATE: 1500-2000 gallons annually

ON-SITE MANAGEMENT: Satellites ☐ Visually inspected ☐ Storage ☐ Visually inspected ☐

stored in Used oil storage containers (250 gallon)

OFF-SITE MANAGEMENT/DISPOSITION: None

6-JAB  
3. WASTE STREAM: used oil Filters

FACILITY DETERMINATION: ☐ Hazardous ☒ Non-hazardous ☐ Not done ☐ Inadequate

WASTE CODES: None

DETERMINATION METHOD: ☐ Product knowledge ☒ Process knowledge ☐ Testing

Documentation: \_\_\_\_\_

GENERATING PROCESS: change filter when servicing equipment

GENERATION RATE: approximately 200/yr

ON-SITE MANAGEMENT: Satellites ☐ Visually inspected ☐ Storage ☐ Visually inspected ☐

Disposed of in general refuse after puncture and hot drain

OFF-SITE MANAGEMENT/DISPOSITION: Black hawk Co. landfill

# Appendix 1-6

## GENERATOR WASTE STREAM WORKSHEET

7 JAB

1. WASTE STREAM: Spent Fluorescent lamps

FACILITY DETERMINATION: ☒ Hazardous ☒ Non-hazardous ☐ Not done ☐ Inadequate

WASTE CODES: D009, Non

DETERMINATION METHOD: ☒ Product knowledge ☐ Process knowledge ☐ Testing

Documentation: MSFAB

GENERATING PROCESS: Maintenance

GENERATION RATE: 13 Doos Annually + 100 green tipped

ON-SITE MANAGEMENT: Satellites ☐ Visually inspected Storage ☐ Visually inspected

Disposed of in general refuse

OFF-SITE MANAGEMENT/DISPOSITION: Blackhawk county landfill

8 JAB

2. WASTE STREAM: Scrap Pallets

FACILITY DETERMINATION: ☐ Hazardous ☒ Non-hazardous ☐ Not done ☐ Inadequate

WASTE CODES: —

DETERMINATION METHOD: ☒ Product knowledge ☒ Process knowledge ☐ Testing

Documentation: —

GENERATING PROCESS: raw materials shipments

GENERATION RATE: 5000 / yr

ON-SITE MANAGEMENT: Satellites ☐ Visually inspected Storage ☐ Visually inspected

stored in trailer for shipment to recycler

OFF-SITE MANAGEMENT/DISPOSITION: Broken Pallet Co. inc.

9 JAB

3. WASTE STREAM: Lead and battery

FACILITY DETERMINATION: ☐ Hazardous ☐ Non-hazardous ☐ Not done ☐ Inadequate

WASTE CODES: D008

DETERMINATION METHOD: ☒ Product knowledge ☐ Process knowledge ☐ Testing

Documentation: —

GENERATING PROCESS: Maintenance of fleet & fork trucks

GENERATION RATE: approximately 25 / yr

ON-SITE MANAGEMENT: Satellites ☐ Visually inspected Storage ☐ Visually inspected

stored in cargo box until shipment

OFF-SITE MANAGEMENT/DISPOSITION: Jeff clayton to lead smelter for  
reclaim JAB reclamation



## Appendix 1-6

## GENERATOR WASTE STREAM WORKSHEET

1. WASTE STREAM: Scrap SteelFACILITY DETERMINATION: ☐ Hazardous ☒ Non-hazardous ☐ Not done ☐ InadequateWASTE CODES: NoneDETERMINATION METHOD: ☒ Product knowledge ☒ Process knowledge ☐ TestingDocumentation: —GENERATING PROCESS: Maint. / PackagingGENERATION RATE: —ON-SITE MANAGEMENT: Satellites ☐ Visually inspected Storage ☐ Visually inspectedstored in cargo container until shippedOFF-SITE MANAGEMENT/DISPOSITION: Jeff Dayton to recycler2. WASTE STREAM: General RefuseFACILITY DETERMINATION: ☐ Hazardous ☒ Non-hazardous ☐ Not done ☐ InadequateWASTE CODES: NoneDETERMINATION METHOD: ☐ Product knowledge ☐ Process knowledge ☐ TestingDocumentation: —GENERATING PROCESS: office & general refuse in facilityGENERATION RATE: 24 cy/mo + 20 cy 2x/yearON-SITE MANAGEMENT: Satellites ☐ Visually inspected Storage ☐ Visually inspectedstored in receptacles and containersOFF-SITE MANAGEMENT/DISPOSITION: Black Hawk Co landfill3. WASTE STREAM: —FACILITY DETERMINATION: ☐ Hazardous ☐ Non-hazardous ☐ Not done ☐ InadequateWASTE CODES: —DETERMINATION METHOD: ☐ Product knowledge ☐ Process knowledge ☐ TestingDocumentation: —GENERATING PROCESS: —GENERATION RATE: —ON-SITE MANAGEMENT: Satellites ☐ Visually inspected Storage ☐ Visually inspectedOFF-SITE MANAGEMENT/DISPOSITION: —

Appendix 1-6

GENERATOR WASTE STREAM WORKSHEET

1. WASTE STREAM: \_\_\_\_\_

FACILITY DETERMINATION: ☐Hazardous    ☐Non-hazardous    ☐Not done    ☐Inadequate

WASTE CODES: \_\_\_\_\_

DETERMINATION METHOD: ☐Product knowledge    ☐Process knowledge    ☐Testing

Documentation: \_\_\_\_\_

GENERATING PROCESS: \_\_\_\_\_

GENERATION RATE: \_\_\_\_\_

ON-SITE MANAGEMENT:    Satellites ☐Visually inspected    Storage ☐Visually inspected

\_\_\_\_\_

\_\_\_\_\_

OFF-SITE MANAGEMENT/DISPOSITION: \_\_\_\_\_

\_\_\_\_\_

2. WASTE STREAM: \_\_\_\_\_

FACILITY DETERMINATION: ☐Hazardous    ☐Non-hazardous    ☐Not done    ☐Inadequate

WASTE CODES: \_\_\_\_\_

DETERMINATION METHOD: ☐Product knowledge    ☐Process knowledge    ☐Testing

Documentation: \_\_\_\_\_

GENERATING PROCESS: \_\_\_\_\_

GENERATION RATE: \_\_\_\_\_

ON-SITE MANAGEMENT:    Satellites ☐Visually inspected    Storage ☐Visually inspected

\_\_\_\_\_

\_\_\_\_\_

OFF-SITE MANAGEMENT/DISPOSITION: \_\_\_\_\_

\_\_\_\_\_

3. WASTE STREAM: \_\_\_\_\_

FACILITY DETERMINATION: ☐Hazardous    ☐Non-hazardous    ☐Not done    ☐Inadequate

WASTE CODES: \_\_\_\_\_

DETERMINATION METHOD: ☐Product knowledge    ☐Process knowledge    ☐Testing

Documentation: \_\_\_\_\_

GENERATING PROCESS: \_\_\_\_\_

GENERATION RATE: \_\_\_\_\_

ON-SITE MANAGEMENT:    Satellites ☐Visually inspected    Storage ☐Visually inspected

\_\_\_\_\_

\_\_\_\_\_

OFF-SITE MANAGEMENT/DISPOSITION: \_\_\_\_\_

\_\_\_\_\_



**D. PERSONNEL TRAINING**

(SQG – 262.34(d)(5)(iii), LQG's – 262.34(a)(4) referencing 265.16, I.S.-265.16 only)

#	✓ / X	REGULATORY REQUIREMENTS*	COMMENTS
1.		Program director trained in hazardous waste management procedures (LQG only)→265.16(a)(2)	
2.		Employees do not work unsupervised without completing training & are trained within 6 mo. of initial hiring (LQG only)→265.16(b)	
3.		Employees are trained annually (LQG only)→265.16(c)	
4.		Job title & name of person filling position specified (LQG only)→265.16(d)(1)	
5.		Written job description including: skills, education or qualification, and duties (LQG only)→265.16(d)(2)	
6.		Written description of type and amount of introductory & continuing training provided (LQG only)→265.16(d)(3)	
7.		Training covers: response to emergencies, implementation of contingency plan, use of alarms, waste feed cut-offs & other emergency equipment, as required (LQG only)→265.16(a)(3)	
8.		Documentation confirming training has been completed (LQG only)→265.16(d)(4)	
9.		Records maintained on-site for current employees & for 3 years for former employees→265.16(d) & (e) respectively	
10.		All employees are familiar with waste handling and emergency procedures relevant to their responsibilities (SQG only)→262.34(d)(5)(iii)	

✓ - in compliance X - not in compliance N/A - not applicable \* - please note applicable permit requirements

11. Notes/Observations: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

# **E. WASTE ANALYSIS/WASTE DETERMINATION AND LAND DISPOSAL RESTRICTIONS**

1. Location of waste analysis/waste determination records: Jeremy Larsen office
2. Person responsible for waste analysis/waste determination: Jeremy Larsen

#	✓/ x	REGULATORY REQUIREMENTS*	COMMENTS
3.	✓	Determines if waste is a hazardous waste-262.11	CESQG
4.	✓	Determines if waste is restricted from land disposal-262.11(d)→268.7(a)(1)	
5.	✓	Determines waste does not meet applicable treatment standards (ATS)-268.7(a)(2)	
a.	NA	One time written notice submitted to treatment or storage facility with initial shipment and a copy placed in file-268.7(a)(2)	
b.		SQG disposes of waste under a contractual or tolling agreement-268.7(a)(10). (LDR Notice available for the initial shipment and copy of LDR Notice kept for 3 years after termination of agreement)	
6.		Waste covered by a National Capacity Variance(s)-268 Subpart C, Extension, or Petition-268.5 & 6. (Describe the variance, extension, or petition that applies)	
a.		Provides a notice to the land disposal facility with the initial shipment, or a revised notice if changes occur, stating that the waste is exempt from the LDRs-268.7(a)(4).	
7.		Ships waste(s) covered by the LDRs off-site for treatment or disposal-268.7(a)(2). If no, go to 8.	
a.		Provides a notice with initial shipment, or new notification, if changes occur-268.7(a)(2)	
b.		Notice includes: EPA hazardous waste number(s), manifest number(s), waste analysis data, if available, and waste constituents, wastewater or non-wastewater classification, and subcategory, if applicable-268.7(a)(2)→268.7(a)(4)	
8.		Determined waste to be excluded from the definition of hazardous or solid waste, or exempt from Subtitle C regulations under 261.2 thru 261.6 subsequent to the point of generation-268.7(a)(7)	
a.		Retains a one-time notice describing the generation, subsequent exclusion or exemption, and the disposition of the waste, in the facility's on-site files-268.7(a)(7). (If soil contaminated with waste, a special certification statement is included with the notice-268.7(a)(2)(i))	
9.		Determines waste or soil contaminated with waste does meet the ATS or does not exceed prohibition levels and requires no further treatment-268.7(a)(3)	
a.		One time written notice submitted to treatment or storage facility with initial shipment and a copy placed in file-268.7(a)(3)(i)	
10.	NA	Additional special rules regarding waste that exhibits a characteristic-268.9	



a.	NA	If not D001 non-wastewater, determines the underlying constituents as defined in 268.2(i)-268.9(a)
b.	1	If land disposed, waste meets the treatment standards specified in 268 Subpart D-268.9(c)
c.	1	First claims that their characteristic waste is no longer hazardous-sends a one-time notification and certification to EPA or authorized State, places a copy in the file, and updates both if there are changes in process, operation or receiving facility-268.9(d)
11.	✓	Impermissible dilution of waste to meet LDR standards in not occurring-268.3(a) & (b)
12.	NA	If hazardous waste prohibited from land disposal is either: a contaminated soil, or is a contaminated soil which is treated, or a lab pack waste, or hazardous waste debris, or managed at a treatment or disposal facility, or the generator's determination is based solely on knowledge - See additional LDR checklists in Appendix 2-1
13.	1	References to Waste Specific Prohibitions under Subpart C: - Wood Preserving Wastes - 268.30 - Dioxin-containing Wastes - 268.31 - TC Metal Wastes - 268.34 - Petroleum Refining Wastes - 268.35 - Ignitable and Corrosive Characteristic Wastes Whose Treatment Standards Were Vacated - 268.37 - Newly Identified Organic Toxicity Characteristic Wastes and Newly Listed Coke By-Product and Chlorotoluene Production Wastes - 268.38 - Spent Aluminum Pot Liners; Reactive; and Carbamate Wastes - 268.39
14.		Prohibition on Storage of Restricted Waste-268.50
15.	NK	Reminder - Treatment Standards listed in 268.41 through 268.49

✓ - in compliance X - not in compliance N/A - not applicable \* - please note applicable permit requirements

16. Notes/Observations: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**F. OPERATING RECORD** (SQG – N/A, LQG's – N/A)

#	√ / X	REGULATORY REQUIREMENTS*	COMMENTS
1.		Written operation record maintained on-site, and until closure-265.73(a) & (b) respectively	
2.		Description of quantity (estimated weight or volume & density), method(s) and date(s) of treatment, storage, or disposal, including: name & EPA waste code(s), physical form, process which produced waste, & handling codes-265.73(b)(1)	
3.		Location and quantity of each hazardous waste at facility cross-referenced to the specific manifest-265.73(b)(2)	

√ - in compliance X - not in compliance N/A - not applicable \* - please note applicable permit requirements

**G. INSPECTIONS** (SQG – N/A, LQG's – N/A)

#	√ / X	REGULATORY REQUIREMENTS*	COMMENTS
1.		Facility is inspected for malfunctions and discharges which may lead to a release or human threat-265.15(a)	
2.		Written schedule for inspecting & monitoring safety, emergency, security, operating & structural equipment-265.15(b)(1)	
3.		Schedule maintained at facility-265.15(b)(2)	
4.		Schedule identifies all types of problems looked for and frequency of inspections-265.15(b)(3-4)	
5.		Areas subject to spills, such as loading/unloading areas, are inspected daily when in use-265.15(b)(4)	
6.		Facility remedies all problems found-265.15(c)	
7.		Inspection records identify the name of inspector, the date & time of inspection, & the date and nature of repairs-265.15(d)	
8.		Inspection records maintained for 3 years-265.15(d)	

√ - in compliance X - not in compliance N/A - not applicable \* - please note applicable permit requirements



**H. CLOSURE/POST-CLOSURE** (SQG – N/A, LQG's – N/A)

#	✓/ X	REGULATORY REQUIREMENTS*	COMMENTS
1.		Facility has written closure plan & provides unapproved plan during inspections-265.112(a)	JAB
2.		Description of how and when the facility and each unit will be closed-265.112(b)(1), (2), and (6)	
3.		Estimate of maximum inventory of hazardous waste ever on-site-265.112(b)(3)	
4.		Detailed description of steps needed to remove & decontaminate all hazardous waste residues and equipment-265.112(b)(4)	
5.		Description of all other closure activities-265.112(b)(5)	
6.		Schedule for closure of each hazardous waste management unit-265.112(b)(6)	
7.		Schedule year of closure for facilities which use trust funds-265.112(b)(7)	
8.		Facility has written post-closure plan (disposal facilities only)-265.118(a)	

✓ - in compliance X - not in compliance N/A - not applicable \* - please note applicable permit requirements

**I. FINANCIAL REQUIREMENTS** (SQG – N/A, LQG's – N/A)

#	✓/ X	REGULATORY REQUIREMENTS*	COMMENTS
1.		Closure/post-closure cost estimates maintained at facility-265.142(d)/265.144(d)	JAB
2.		Written cost estimate in current dollars for closure &/or post-closure-265.142(a) &/or 265.144(a)	
3.		Cost estimate based on maximum inventories and greatest expense for closure-265.142(a)(1)	
4.		Cost estimate based on hiring a third party to perform closure/post-closure-265.142(a)(2) / 265.144(a)(1)	
5.		Salvage/sale values not incorporated into cost estimates-265.142(a)(3)	
6.		Cost estimate adjusted for inflation 60 days prior to anniversary date-265.142(b) / 265.144(b)	
7.		Financial assurance instrument for closure/post-closure established-265.143 / 265.145 (note type of instrument used)	
8.		Liability insurance or pass financial test for sudden & non-sudden (land treatment/disposal only) occurrences-265.14(a) & (b)	

✓ - in compliance X - not in compliance N/A - not applicable \* - please note applicable permit requirements

**J. USED OIL – RCRA INSPECTION CHECKLIST**1. What Used Oil activities does the facility engage in? Generation, Heat - used oil Enginea. Type of used oil generated? Motor oilb. Amount of used oil generated? 1500-2000 gallons annually**40 CFR 279.12 Prohibition Questions**

1. Is used oil being managed only in a surface impoundment or waste pile subject to regulation under 40 CFR Parts 264 or 265?

☐ Yes ☒ No ☐ Not Applicable (NA)2. Is used oil being used as a dust suppressant? ☐ Yes ☒ No3. Is off-specification oil fuel burned for energy recovery in only industrial furnaces, industrial boilers, utility boilers, used oil-fired space heaters, or hazardous waste incinerators identified in 40 CFR Part 279.12 (c)(1-3)? ☐ Yes ☒ No**Subpart C – Standards for Used Oil Generators**(Check here ☐ if this section is NA)

**Instructions:** Fill out this section if the facility generates used oil or if facility activities first caused the used oil to become subject to regulation (see definition and applicability of used oil generator in 40 CFR 279.20). Used oil generators are subject to all applicable Spill Prevention, Control and Countermeasures (SPCC) requirements (40 CFR Part 112) and underground storage tank standards (40 CFR Part 280) in addition to the requirements of Subpart C.

Regulation and Standard		Violations
<b>279.21 Hazardous Waste Mixing</b> 1. Is the generator mixing hazardous waste with used oil? If yes, is the generator of a used oil containing greater than 1,000 parts per million (ppm) total halogens managing the used oil as a hazardous waste unless the used oil presumption is rebutted? 2. Are analytical data available?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	DO NOT waste only Parts washer fluid
<b>279.22 Used Oil Storage</b> 1. Does the generator only store used oil in tanks, containers, or units subject to regulation under 40 CFR Parts 264 or 265? 2. Are containers and aboveground tanks used by a generator to store used oil in good condition, with no visible leaks? 3. Are containers, aboveground tanks, and fill pipes used for underground tanks labeled or marked "Used Oil"? 4. Upon detection of a release of used oil, has the generator a. Stopped the release? b. Contained the release? c. Cleaned up and managed the used oil and other materials? d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	NOFF 1-250 gallon container 1-200 gallon Tank
<b>279.23 Used Oil Storage</b> 1. Is the generator burning used oil in used oil fired space heaters only when a. The heater burns only used oil that the owner or operator generates or used oil received from household do-it-yourself generators? b. The heater is designed to have a maximum capacity of not more than 0.5 million British Thermal Units per hour? c. The combustion gasses from the heater are vented to ambient air?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	Purchased oil and burned in 2016



Regulation and Standard		Violations
<p><b>279.24 Off-Site Shipment</b></p> <p>1. Has the generator ensured that the used oil is hauled only by a transporter that has obtained a U.S. Environmental Protection Agency (EPA) identification (ID) number?</p> <p>2. Does the generator have a tolling arrangement with a transporter without an EPA ID number?</p> <p><i>If yes, answer the three following questions. If no, move to question 6.</i></p> <p>3. Is the used oil reclaimed and returned by the processor or re-refiner to the generator for use as a lubricant, cutting oil, or coolant?</p> <p>4. Does the tolling contract indicate the type of used oil and the frequency of shipment?</p> <p>5. Is the vehicle used to transport the used oil to the processing or re-refining facility and to deliver recycled used oil back to the generator owned and operated by the used oil processor or re-refiner?</p> <p>6. Does the generator transport used oil generated at the generator's site or used oil collected from household do-it-yourselfers to a used oil collection center or to aggregation points owned by the generator?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>	
Regulation and Standard		Violations
<p>7. Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator?</p> <p>8. Does the generator transport no more than 55 gallons of used oil at any time?</p> <p>9. Does the generator transport the used oil to a used oil collection center that is registered, licensed, permitted, or recognized by a state/county/municipal government to manage used oil?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>	<p>No oil transported off-site</p>

For further Used Oil questions refer to Appendix 2-4:

Subpart D – Standards for Used Oil Collection Centers and Aggregation Points

Subpart E – Standards for Used Oil Transporters and Transfer Centers

Subpart F – Standards for Used Oil Processors and Re-Refiners

Subpart G – Standards for Used Oil Burners Who Burn Off-Specification Used Oil for Energy Recovery

Subpart H – Standards for Used Oil Fuel Marketers

## K. Universal Waste (UW)

### 1. Universal Waste Generated

Waste:	Fluorescent & HID Lamps	Batteries	Hg-containing equip. and/or thermostats	Pesticides
Qty. Generate/year:	_____	_____	_____	_____
Qty. Presently in storage:	_____	_____	_____	_____
Accumulation Time:	_____	_____	_____	_____
Present Disposal Method:	_____	_____	_____	_____

2. Person(s) responsible for universal waste management: \_\_\_\_\_

3. Does the universal waste handler accumulate (collectively) 5,000 kilograms or more at any time (40 CFR 273.9)? **If YES**, a large quantity handler (LQH), go on and also refer to checklist in Appendix 2-2. **If NO**, a small quantity handler (SQH), go on.

Assessing Requirements Common to *Universal Waste SQH & LQH* (40 CFR 273 Subpart B & C, respectively):

#	√ / x	REGULATORY REQUIREMENTS*	COMMENTS
1.		Disposal of UW is not occurring-273.11(a)/273.31(a)	
2.		Diluting or treating universal waste is not occurring, except for responding to releases per 273.17 or by managing specific wastes per 273.13 (waste management)-273.11(b)/273.31(b)	
3.		Has the LQH notified of UW management?-273.32 (a)(1) (not required for SQH)	
4.		Has UW been shipped to another UW handler, a designated facility, or a foreign destination?-273.18(a)/273.38(a) If not, see Appendix 2-2 for off-site shipments	
a.		Does LQH have documentation tracking shipments?-273.39 (not required for SQH-273.19)	
5.		UW package, container, tank, vessel or transport vehicle is marked or labeled-273.14/273.34-as follows:	
a.		"Universal Waste-Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)"-273.14(a)/273.34(a)	
b.		For recalled universal waste pesticides; "Universal Waste-Pesticide(s)" or "Waste-Pesticide(s)," and the label that was on or accompanied the product as sold or distributed, or if the label is not available or not feasible to use, the appropriate DOT label as identified in 49 CFR 172-273.14(b)/273.34(b)	
c.		For unused pesticide products as described in 40 CFR 273.3(a)(2): (1) the label that was on the product when purchased, if still legible; (2) if using that label is not feasible, the appropriate label required under DOT regulation 49 CFR Part 172; (3) if using either of the previously described labels is not feasible, another label prescribed or designated by the waste pesticide collection program administered or recognized by a state; <b>and</b> (4) the words "Universal Waste-Pesticide(s)" or "Waste-Pesticide(s)"-273.14(c)/273.34(c)	
d.		"Universal Waste-Mercury Containing Equipment," or "Waste Mercury-Containing Equipment," or "Used Mercury-Containing Equipment"-273.14(d)(1)/273.34(d)(1) <u>Thermostats may be labeled:</u> "Universal Waste-Mercury Thermostat(s)," or "Waste Mercury Thermostat(s)," or "Used Mercury Thermostat(s)"-273.14(d)(2)/273.34(d)(2)	
e.		"Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)"-273.14(e)/273.34(e)	



Tank #2 – Name & location of tank: \_\_\_\_\_

Person responsible for tank area: \_\_\_\_\_

Age of tank when it first stored/treated/held a hazardous waste: \_\_\_\_\_

How was age verified? \_\_\_\_\_

Tank design capacity: \_\_\_\_\_ Type of waste in tank: \_\_\_\_\_

Volume currently in the tank: \_\_\_\_\_ How was volume verified? \_\_\_\_\_

Length of time in tank: ☐ <90 day ☐ <180 day ☐ <270 day ☐ I.S. ☐ Permit

Photos taken? ☐ YES ☐ NO Photo numbers: \_\_\_\_\_

Area noted on map or diagram: ☐ YES ☐ NO

Tank #3 – Name & location of tank: \_\_\_\_\_

Person responsible for tank area: \_\_\_\_\_

Age of tank when it first stored/treated/held a hazardous waste: \_\_\_\_\_

How was age verified? \_\_\_\_\_

Tank design capacity: \_\_\_\_\_ Type of waste in tank: \_\_\_\_\_

Volume currently in the tank: \_\_\_\_\_ How was volume verified? \_\_\_\_\_

Length of time in tank: ☐ <90 day ☐ <180 day ☐ <270 day ☐ I.S. ☐ Permit

Photos taken? ☐ YES ☐ NO Photo numbers: \_\_\_\_\_

Area noted on map or diagram: ☐ YES ☐ NO

Tank #4 – Name & location of tank: \_\_\_\_\_

Person responsible for tank area: \_\_\_\_\_

Age of tank when it first stored/treated/held a hazardous waste: \_\_\_\_\_

How was age verified? \_\_\_\_\_

Tank design capacity: \_\_\_\_\_ Type of waste in tank: \_\_\_\_\_

Volume currently in the tank: \_\_\_\_\_ How was volume verified? \_\_\_\_\_

Length of time in tank: ☐ <90 day ☐ <180 day ☐ <270 day ☐ I.S. ☐ Permit

Photos taken? ☐ YES ☐ NO Photo numbers: \_\_\_\_\_

Area noted on map or diagram: ☐ YES ☐ NO

JAB

## Appendix 1-10

## EXIT BRIEFING

1. Reviewed all data collected and documented all concerns or violations? ☒ Yes ☐ No
- Location of the violation, type and amount of waste involved, time frame, frequency, specific dates & when first started occurring.
  - Illegal units-unit location (diagram/picture), dimensions, conditions, construction material, gradient of the base (for spills), other information.
  - Illegal disposal-how, when (each occurrence), where sent or disposed of, how shipped, who shipped, when shipped/discharged, quantity.
- ☐ Identified/verified violations from previous inspection were corrected (if applicable)
- ☒ Addressed all unresolved inspection related issues
- ☒ Summarized findings and observations for the facility representatives
- NOV issued? ☒ Yes ☐ No ☒ Violations clearly identified and explained, including: circumstances, location, and applicable regulations
- ☒ Explained the importance of a timely (14 day) and adequate response
- ☒ Explained that findings and observations are based on your current knowledge of RCRA and that the final findings may differ
- ☒ Explained that compliance officer will make final compliance decisions and that all compliance questions should be directed toward them
- ☒ Explained that recommendations provided are for informational purposes only and DO NOT require specific actions by the facility
- ☒ Provided facility with CBI form
- ☒ Prepared Document Receipt form
3. Specific information requested from facility? ☐ Yes ☒ No

4. Facility appears to have awareness of RCRA regulations? ☒ Yes ☐ No

5. Facility has its own environmental staff? ☐ Yes ☒ No

6. Facility has copy of applicable regulations? ☐ Yes ☒ No

7. Attitude and demeanor of facility representative(s); ☒ OK ☐ Not OK

8. Notes/Observations:



## Subpart G – Standards for Used Oil Burners Who Burn Off-Specification Used Oil for Energy Recovery

(Check here ☐ if this section is NA)

Instructions: Fill out this section if the facility burns used oil not meeting the specification requirements in 40 CFR 279.11 for energy recovery in devices identified in 40 CFR 279.61(a). See 40 CFR 279.60 and 279.61 for more detail.

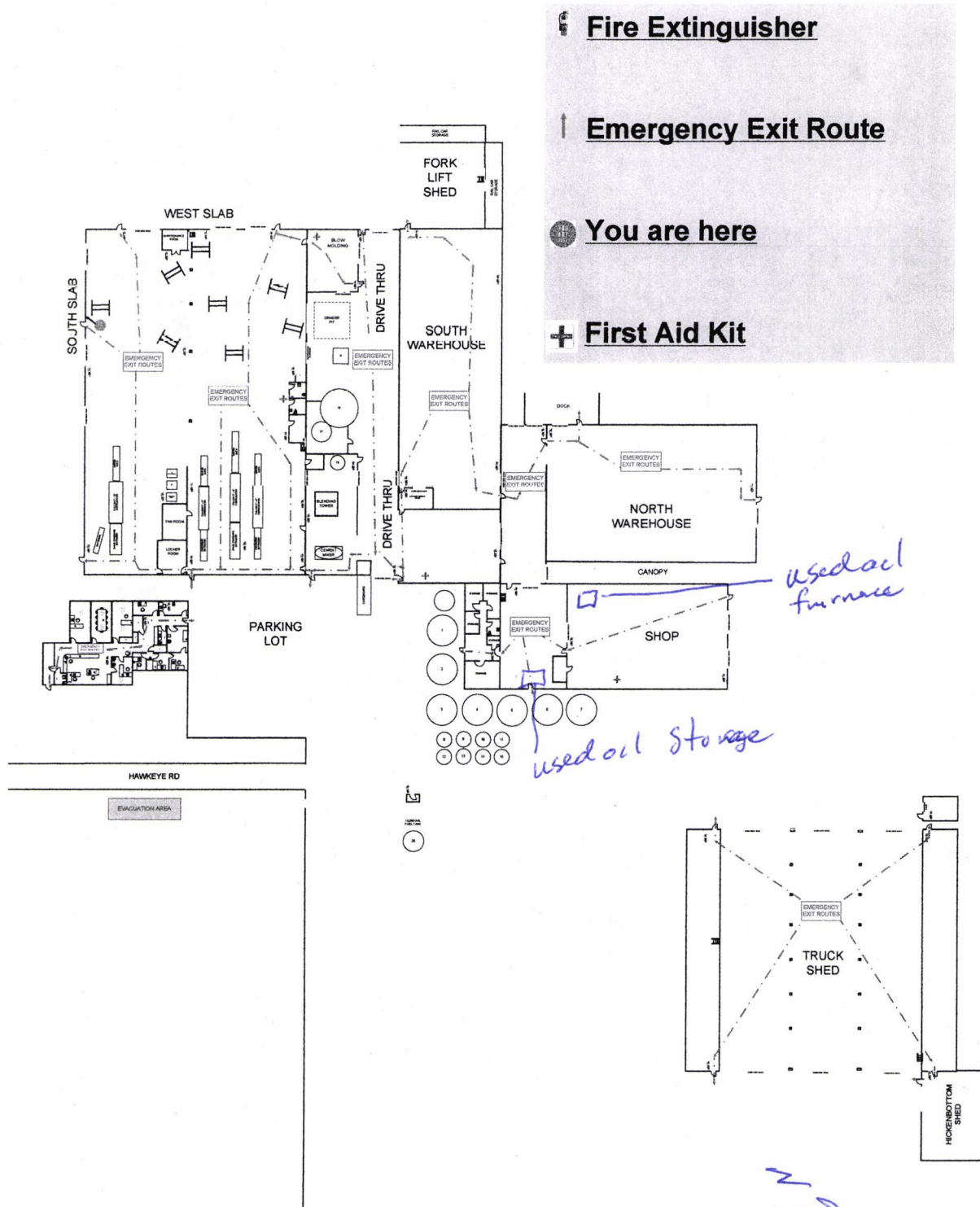
Regulation and Standard	Violations
<b>279.61 Restrictions on Burning</b> 1. Is the facility burning off-specification used oil fuel for energy recovery in only the devices listed in 40 CFR 279.61? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
<b>279.62 Notification</b> 1. Has the used oil burner complied with the notification requirements of RCRA Section 3010 and obtained an EPA ID number? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
<b>279.63 Rebuttal Presumption for Used Oil</b> 1. Has the used oil burner determined whether the total halogen content of the used oil being transported or stored at a transfer facility is above or below 1,000 ppm? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <i>AJAB</i> 2. Has the used oil burner retained all records of analyses and information used to comply with 40 CFR 279.63 for at least 3 years? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <i>JAB</i>	<i>- below 1000 ppm</i>
<b>279.64 Used Oil Management</b> 1. Has the used oil burning facility: a. Only stored used oil in tanks, containers, or units subject to regulation under 40 CFR Parts 264 or 265? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA b. Only stored used oil in containers and aboveground tanks in good condition and not leaking? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA c. Provided for secondary containment for containers and new or existing aboveground tanks that consists of (1) dikes, berms, or retaining walls; (2) a floor that covers the entire area within the dikes, berms, or retaining walls; and (3) an entire system that is sufficiently impervious to used oil to prevent any used oil being released? (Note: an equivalent secondary containment system is acceptable) <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA 2. Are containers, aboveground tanks, and fill pipes used to transfer used oil into underground storage tanks at used oil burner facilities labeled or marked clearly with the words "Used Oil"? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <i>AJAB</i> 3. Upon detection of a release of used oil, has the facility: a. Stopped the release? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA b. Contained the released used oil? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA c. Cleaned up and properly managed the released used oil and other materials? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA d. If necessary, repaired or replaced any leaking used oil storage containers or tanks prior to returning them to service? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<i>- NIPF issued</i>



Regulation and Standard	Violations
<p><b>279.65 Tracking</b></p> <p>1. Has the facility kept a record of each used oil shipment accepted for used oil burning (such as a log, invoice, manifest, bill of lading, or other shipping document) that includes:</p> <p>a. Name and address of the transporter who delivered the used oil to the used oil burner? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p>b. Name and address of the generator or processor or re-refiner from whom the used oil was sent for burning? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p>c. EPA ID number of (1) the transporter who delivered the used oil to the used oil burner and (2) the generator or processor or re-refiner from whom the used oil was sent for burning? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p>d. The quantity of used oil accepted and the date of acceptance? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p>2. Have the records described above been maintained for at least 3 years? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p>	<p><i>one shipment received in 2016</i></p>
<p><b>279.66 Notices</b></p> <p>1. Prior to accepting the first shipment of off-specification used oil fuel, has the used oil burner provided to the generator, transporter, or processor or re-refiner a one-time written and signed notice certifying that:</p> <p>a. The burner has notified EPA of the state agency stating the location and general description of the used oil management activities? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p> <p>b. The burner will burn used oil only in an industrial furnace or boiler identified in 40 CFR 279.61(a)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p>2. Has the certification been maintained for at least 3 years from the date the burner last received a shipment of used oil from the generator, transporter, or processor or re-refiner? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p>	<p><i>oil not off-specification from Northland oil</i></p> <p><i>- only one shipment ever.</i></p>
<p><b>279.67 Management of Residues</b></p> <p>1. Does the used oil burner who generates residues from the storage, processing, or re-refining of used oil manage these residues as specified in 40 CFR 279.10(c)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>	



# Jesup Facility Layout



Copies of this map are posted throughout the facility. All exists will remain unlocked and unobstructed during working hours except the shop will be locked after business hours due to security purposes.





850 Hawkeye Rd

© 2016 Google

Google Earth

Google Earth

feet  
meters

200 800



Attachment 13 Page 1 of 1





HOME (/) | SPECIALS (/SPECIALS) | 9966D - MX300 WASTE OIL HTR VALUE PACKAGE D



## 9966D - MX300 WASTE OIL HTR VALUE PACKAGE D

Heater and 215 gallon tank with thru wall 8" chimney kit

Chimney Kit Includes (16' eave): 1 chimney cap, 3 (36") Class A chimney pipe, 1 adjustable wall strap, 1 Class A tee with cap, 1 (6") Class A chimney pipe, 1 tee support bracket, 1 (18") Class A chimney pipe, 1 finishing collar, 1 (14") slip connector, 2 (24") black pipe, 1 (90°) elbow (MX 250/300 only)

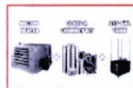
Base SKU: 9966D

In Stock: Yes

Weight: 1265.00 lbs

Original Price: \$6,999.00

**\$5,999.00**



([https://www.lanair.com/content/images/thumbs/0000080\\_9966d-mx300-waste-oil-htr-value-package-d.jpeg](https://www.lanair.com/content/images/thumbs/0000080_9966d-mx300-waste-oil-htr-value-package-d.jpeg))

([https://www.lanair.com/content/images/thumbs/0000081\\_9966d-finisher-kit-value-package-d.jpeg](https://www.lanair.com/content/images/thumbs/0000081_9966d-finisher-kit-value-package-d.jpeg))

([https://www.lanair.com/content/images/thumbs/0000082\\_9966d-mx300-waste-oil-htr-value-package-d.jpeg](https://www.lanair.com/content/images/thumbs/0000082_9966d-mx300-waste-oil-htr-value-package-d.jpeg))

**\$130.18/month** [Click](#)

Quantity:

[Add To Cart](#)



([https://www.lanair.com/content/images/thumbs/0000084\\_9966d-mx300-waste-oil-htr-value-package-d.jpeg](https://www.lanair.com/content/images/thumbs/0000084_9966d-mx300-waste-oil-htr-value-package-d.jpeg))

Here

([https://www.marlinnet.net/leaserep.php?](https://www.marlinnet.net/leaserep.php?monthPay=130.18&term=60)

monthPay=130.18&term=60

Months&totalCost=5999.00&apiKey=8007531601&eq\_desc1=9966D

- MX300 WASTE OIL HTR VALUE

PACKAGE

D&eq\_qty1=1&eq\_cost1=5999.00)

Overview

Specifications

Manuals

Videos

Reviews

### Products Specifications



Heat Range (BTUH)*	to 300,000
Fuel Input (GPH)	2.14
Heating Area (sq. ft)**	to 10,000
Power Supply (AC)	120 V.60Hz 20 Amps
Cabinet Dimensions (H-W-D)	36" x 46" x 48"
Hanging weight (lbs.)	630
Axial Fan (CFM)	4,600
Chimney Pipe***	8" Class A
Compressed Air****	2 CFM - 18 PSI
Combustion Chamber	10 Gauge CRS
Ductable Option	Call
Chimney Location	Top

\*BTUH value varies with fuel type

\*\*The suggested heating area is based on building with minimal heat loss due to open door, construction, materials, windows, insulation, etc...

\*\*\* Chimney package is optional

\*\*\*\*Customer supplied. Source must be capable of producing 2.0 CFM @ 60 PSI.

Attachment 14 Page 1 of 1

SHIP TO:  
PRINSCO  
920 HAWKEYE ROAD  
JESUP, IOWA



**CERTIFICATE OF ANALYSIS**

PRODUCT: **USED OIL**

DELIVERY DATE	2-17-16
QUANTITY	2000
ORDER #	433291
Truck #	949

**ANALYSIS:**

<b><u>TEST</u></b>	<b><u>RESULTS</u></b>	
Flash Point	> 160 F	
Chromium	1	ppm
Lead	6	ppm
Arsenic	0.0	ppm
Cadmium	.09	ppm
Sulfur	.55	ppm
Water, %	.96	%
Halogens	<1000	ppm
PCB's	0	ppm
Density	7.204	

SUBMITTED BY:  
Brian Motzko  
EH & S Compliance Manager

**NORSOLV SYSTEMS ENVIRONMENTAL SERVICES  
A DIVISION OF NORTHLAND PRODUCTS COMPANY**

1000 RAINBOW DRIVE \* P.O. BOX 418 \* WATERLOO, IOWA 50704-0418  
319-234-5585 \* 800-772-1724 \* FAX 319-234-5580





NORTHLAND PRODUCTS CO.  
1000 RAINBOW DR  
P O BOX 418  
WATERLOO IA 50704  
Phone: (319)-234-5585

\*\*\*\*\*  
\* INVOICE \*  
\*\*\*\*\*

Invoice # 433291  
Inv Date: 02/19/16  
Page # 1

## SOLD TO:

PRINSCO  
920 HAWKEYE ROAD  
PO BOX 527  
JESUP IA 50648

## SHIP TO:

PRINSCO  
920 HAWKEYE ROAD  
PO BOX 527  
JESUP IA 50648

P.O. #

Phone: (319)827-6428  
Fax:

Terms	Order#/Rel	Cust #	SalesRep	Ship Via	Req-Dt	Reference
CREDIT CARD	433291-000	4110435	McCONAUGHY	NORTHLAND	021716	TL

Stock #	Shipped Description	Cont	Price/ Unit	Price/ Cont	Net
88Z9A	2000 DELIVER USED OIL	GAL		.50	1000.00
Sub Total					1000.00
Total					1000.00
Less Amount Charged to Credit Card# *****4371					1000.00
Balance Due:					.00

Attn: Kenny Reisher

Thank You.



Environmental Services  
1000 RAINBOW DRIVE  
POST OFFICE BOX 418  
WATERLOO, IOWA 50704-0418  
319-234-5585 • 800-772-1724 • FAX 319-234-5580

**NORTHLAND**  
MOTOR OILS • LUBRICANTS  
NORTHLAND PRODUCTS COMPANY

ISO 9001 Registered Quality Management System  
ISO 14001 Registered Environmental Management System  
US EPA ID NUMBER IAD022365480

DOCUMENT NO.  
433291

BILL TO

SERVICE LOCATION

Prinsco  
Jesup, Ia

MEMO:

WEEK OF	GENERATOR'S US EPA ID NO	CUSTOMER NO	P.O. NUMBER	DAY SERVICED																								
		4110435		2/17/16																								
STOCK NO.	DESCRIPTION	QUANTITY	COMP. #																									
	Delivered used oil	2000 gal																										
Delivery of Empty Containers		Pickup of Full Containers																										
	<table border="1"><thead><tr><th>Drums</th><th>Totes</th></tr></thead><tbody><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr></tbody></table>	Drums	Totes										<table border="1"><thead><tr><th>Drums</th><th>Totes</th><th>Gallon Quantity</th></tr></thead><tbody><tr><td></td><td></td><td></td></tr><tr><td></td><td></td><td></td></tr><tr><td></td><td></td><td></td></tr><tr><td></td><td></td><td></td></tr></tbody></table>	Drums	Totes	Gallon Quantity												
Drums	Totes																											
Drums	Totes	Gallon Quantity																										
Used Oil Filters		Used Oil Filters																										
Used Antifreeze		Used Antifreeze																										
Used Oil		Used Oil																										
Used Absorbents		Used Absorbents																										
		\$50/gal																										

**DISPOSAL RESTRICTION NOTIFICATION:**

IN ACCORDANCE WITH NORTHLAND PRODUCTS CO. AND NORSOLV SYSTEMS ENVIRONMENTAL POLICIES AND PROCEDURES, ALL WASTES ARE BENEFICIALLY RECYCLED, USED FOR ENERGY RECOVERY OR DESTROYED BY INCINERATION, IN FULL COMPLIANCE WITH ALL FEDERAL, STATE AND LOCAL REGULATIONS. NO WASTE IS DISPOSED OF IN ANY LANDFILL OR NAVIGABLE WATERS OF THE UNITED STATES. ADDING OR CO-MINGLING ANY FORM OF HAZARDOUS WASTE TO NON-HAZARDOUS WASTE STREAMS IS PROHIBITED.

**GENERATOR COMPLIANCE CERTIFICATION:**

AS THE GENERATOR OF THESE PRODUCTS, GENERATOR HEREBY CERTIFIES THAT NO FORM OF HAZARDOUS WASTE WAS CO-MINGLED, MIXED WITH OR ADDED TO THIS/THESE PRODUCTS. GENERATOR ACKNOWLEDGES ANY MISREPRESENTATION OF THIS SECTION IS AN ACTIONABLE EVENT THAT WILL EXPOSE GENERATOR TO ADDITIONAL COSTS, PENALTIES AND/OR ENFORCEMENT ACTIONS. I ALSO CERTIFY THAT NO MATERIAL CHANGE HAS OCCURRED EITHER IN THE CHARACTERISTICS OF THE WASTE MATERIALS OR IN THE PROCESS OF GENERATING THE WASTE MATERIAL. Initials \_\_\_\_\_

I CERTIFY THAT MY TOTAL WASTE STREAMS ARE WITHIN ONE OF THE FOLLOWING CATEGORIES:

☐ 0-220 LBS PER MONTH (CESQG) \_\_\_\_\_ ☐ 220-2200 LBS PER MONTH (SQG) \_\_\_\_\_ ☐ GREATER THAN 2200 LBS PER MONTH (LQG) \_\_\_\_\_

Rep 800 Jerry

GENERATOR SIGNATURE: \_\_\_\_\_

NORSOLV SIGNATURE: \_\_\_\_\_

Attachment 15 Page 3 of 5  
4 TAB



# **NORTHLAND**

**MOTOR OILS • LUBRICANTS**

153687

Date: 2/17/16

Customer: Prinsco

City: Jessup

AUTOMATICALLY  
PRINTED



TO INSURE YOU  
OF ACCURACY

GALLON READING—FINISH	10THS
2000	1
GALLON READING—START	
GALLONS DELIVERED	

Product: Used oil delivery

Customer sign here after delivery only—Above gallons delivered

50/951

## Prinsco Scrap Batteries sales

Date	Lbs	Approx # of Batteries	Sold to
7/25/2015	1264	25	Jeff Clayton
11/10/2016	1291	26	Jeff Clayton



# T8/T5 Plant Light Bulbs Inventory

<u>T8</u>		<u>T5</u>	
Date	Qty.	Date	Qty.
5/8/2017	12	5/8/2017	31

# ORDER ACKNOWLEDGEMENT



**CUSTOMER NUMBER:** 145076  
**PURCHASE ORDER NUMBER:**  
**JOB NAME:**  
**FAX NUMBER:**  
**WEB NUMBER:**

1501 96th Street  
 Sturtevant, Wisconsin 53177  
**WEB:** [www.e-conolight.com](http://www.e-conolight.com)  
**PHONE:** 888.243.9445

## SOLD TO:

Prinsco  
 1717 16th Street NE  
 WILLMAR, MN 56201  
 United States

## SHIP TO:

Prinsco  
 850 Hawkeye Road  
 JESUP, IA 50648  
 United States

ORDER DATE	PAYMENT TERMS	PAYMENT	CS	SHIP VIA	S.O. NUMBER
10/26/2016	PREPAY	CREDIT_CARD		Ground	7141296

QTY. ORD.	ITEM	DESCRIPTION	MARK AS	UNIT PRICE	EXTENDED AMOUNT	SHIPPING DATE
2	LF54T5841-C	F54W/T5/841 (40)		97.50	195.00	10/27/2016

## NOTES:

<b>SUBTOTAL</b>	195.00
<b>SHIPPING &amp; HANDLING</b>	9.75
<b>TAX</b>	15.60
<b>TOTAL</b>	220.35

Thank you for your order!

Seller: E-CONOLIGHT LLC

Shipping Terms: Exworks (EXW)

All orders are subject to Seller's Sales Terms and Conditions at [www.e-conolight.com/terms](http://www.e-conolight.com/terms). This order acknowledgement is an agreement by Seller to sell products and services on the terms and conditions in this order acknowledgement and in Seller's Sales Terms and Conditions at [www.e-conolight.com](http://www.e-conolight.com) (collectively, the "Agreement"). SELLER'S ACCEPTANCE OF ALL ORDERS IS EXPRESSLY CONDITIONED UPON BUYER'S ACCEPTANCE OF SELLER'S SALES TERMS AND CONDITIONS. ANY CHANGES OR ADDITIONS TO THIS ORDER ACKNOWLEDGEMENT OR SELLER'S SALES TERMS AND CONDITIONS ARE HEREBY EXPRESSLY REJECTED BY SELLER AND ARE NOT BINDING ON SELLER

Check out [www.e-conolight.com](http://www.e-conolight.com) for web specials





**First Class Distribution LLC**  
PO Box 265  
Stewartstown, PA 17363

# INVOICE

Date 3/29/2016

Invoice # 80431

Phone # 855-637-2584

customerservice@firstclassdistributor.com

**Attn: Accounts Payable**

Prinsco Inc  
850 Hawkeye Rd  
Jesup, IA 50648

**Ship To**

Prinsco Inc  
850 Hawkeye Rd  
Jesup, IA 50648

**Customer**  
Jeff Clayton

**Due Date**  
4/28/2016

**Terms**  
Net 30

**Warehouse**  
UPS

Qty	Item	Amount
25	F32T8 841 Series LL 10 Year Free Replacement Plan Free Shipping	597.25

PLEASE DETACH AND RETURN BOTTOM PORTION WITH PAYMENT

**Total** \$597.25

**Bill to address:**

Prinsco Inc  
850 Hawkeye Rd  
Jesup, IA 50648

**Please make checks payable to:**

First Class Distribution LLC  
PO Box 265  
Stewartstown, PA 17363

**REMITTANCE**

Date 3/29/2016

Invoice # 80431

Balance Due \$597.25

**AMT ENCLOSED**

Due Date 4/28/2016

☐ Please check box if address is incorrect or has changed, and indicate change(s) on the envelope.

CREDIT CARD No.: \_\_\_\_\_

EXPIRATION \_\_\_\_\_ CID \_\_\_\_\_

SIGNATURE \_\_\_\_\_



Attachment 17 Page 3 of 3



# Jesup Scrap Steel List

Date	Lbs	Tons	Sold to
Year of 2015	9276	4.638	Jeff Clayton
Year of 2016	17166	8.583	Jeff Clayton



# Sales Orders Activity

✓

Cust #	Company Name	Order #	PO #	Class	Item #	Item Description	Rev	Request Date	Promise Date	Ship Date	Rel Qty	Status
837703	WAS BROKEN PALLET CO, INC - C184633-25	J036994-25		MC	MISCPRODUCT	MISC. PRODUCT - SEE ITEM COMMENT		3/31/2017	3/31/2017	3/31/2017	480	ORDERS
837703	WAS BROKEN PALLET CO, INC - C184297-25	J036900-25		MC	MISCPRODUCT	MISC. PRODUCT - SEE ITEM COMMENT		3/17/2017	3/17/2017	3/17/2017	480	ORDERS
837703	WAS BROKEN PALLET CO, INC - C180291-25	J034330-25		MC	MISCPRODUCT	MISC. PRODUCT - SEE ITEM COMMENT		7/22/2016	7/22/2016	7/21/2016	480	ORDERS
837703	WAS BROKEN PALLET CO, INC - C183941-25			MC	MISCPRODUCT	MISC. PRODUCT - SEE ITEM COMMENT		2/24/2017	2/24/2017	2/14/2017	480	ORDERS
837703	WAS BROKEN PALLET CO, INC - C181161-25	J036048-25	8	MC	MISCPRODUCT	MISC. PRODUCT - SEE ITEM COMMENT		9/16/2016	9/16/2016	9/6/2016	480	ORDERS
837703	WAS BROKEN PALLET CO, INC - C181443-25	J036124-25		MC	MISCPRODUCT	MISC. PRODUCT - SEE ITEM COMMENT		9/23/2016	9/23/2016	9/23/2016	480	ORDERS
837703	WAS BROKEN PALLET CO, INC - C182016-25	J036290-25		MC	MISCPRODUCT	MISC. PRODUCT - SEE ITEM COMMENT		10/20/2016	10/20/2016	10/19/2016	480	ORDERS
837703	WAS BROKEN PALLET CO, INC - C183615-25	J036808-25		MC	MISCPRODUCT	MISC. PRODUCT - SEE ITEM COMMENT		1/12/2017	1/12/2017	1/11/2017	480	ORDERS
837703	WAS BROKEN PALLET CO, INC - C183506-25	J036789-25		MC	MISCPRODUCT	MISC. PRODUCT - SEE ITEM COMMENT		12/21/2016	12/21/2016	12/20/2016	480	ORDERS
837703	WAS BROKEN PALLET CO, INC - C179527-25	J034133-25		MC	MISCPRODUCT	MISC. PRODUCT - SEE ITEM COMMENT		5/27/2016	5/27/2016	5/26/2016	480	HISTORY
837703	WAS BROKEN PALLET CO, INC - C185019-25	J037119-25		MC	MISCPRODUCT	MISC. PRODUCT - SEE ITEM COMMENT		6/9/2017	6/9/2017	4/17/2017	480	ORDERS

11 times @ 480/time= 5280 pallets

## RECORD CONTROL CHECK SHEET

### Media

Air	RCRA	Water	Other
	X		

Date of Inspection 5/8/2017

Activity Number 4724

Facility ID Number IAR000508150

Facility Name and Address Prinsco, Inc.  
850 Hawkeye Rd  
Jesup, IA 50648

The following documents pertaining to this activity are contained in the package:

<u>Document</u>		<u>Yes</u>	<u>No</u>	<u>NA</u>
Final Report with attachments	<u>92</u> Pages	(✓)	( )	( )
Field sheets	<u>93</u> Pages	( )	( )	(✓)
Chain of Custody	<u>—</u> Pages	( )	( )	(✓)
Analytical data sheets	<u>—</u> Pages	( )	( )	(✓)
Pre-inspection documents	<u>—</u> Pages	( )	( )	(✓)
Photographic negatives (if applicable)	<u>—</u> Pages	( )	( )	(✓)
Photographs (not included in this report)	<u>3</u> Pages	(✓)	( )	( )
CD-ROM containing <u>18</u> photos/videos	<u>1</u> CD-ROM	(✓)	( )	( )
Field notebook w/ <u>—</u> pages used	<u>—</u> Notebook	( )	( )	(✓)
Other documents (list below)				
<u>Field Notes</u>	<u>4</u> Pages			
<u> </u>	<u> </u> Pages			
<u> </u>	<u> </u> Pages			
<u> </u>	<u> </u> Pages			

(Note: If additional space is needed to list specific documents, utilize reverse side)

### CERTIFICATION

I, the undersigned, certify that all of the documents pertaining to this activity that were in my possession have been listed above and were included in this package at the time this statement was signed.

Joshua A. Brubaker  
 Activity Leader's Signature and Date



## NOT INCLUDED PHOTO LOG

Facility Name / City: Prinsco, Inc.  
850 Hawkeye Rd.  
Jesup, IA 50648

Facility ID #: IAR000508150

Date: May 08, 2017

Photographer: Joshua A. Buehre

Type of Camera: Sony Digital Still Camera, DSC – W370, Serial #567825

Digital Recording Media: Memory Stick

All digital Photos were copied by: Joshua A. Buehre on 05/27/2017

All digital Photos were copied to: to print and CD-R

Original copy is stored in: CD-R. All digital Photos were downloaded to CD-R by Joshua A. Buehre on 05/27/2017. No changes were made in the original image files prior to print and storage on the CD-R.

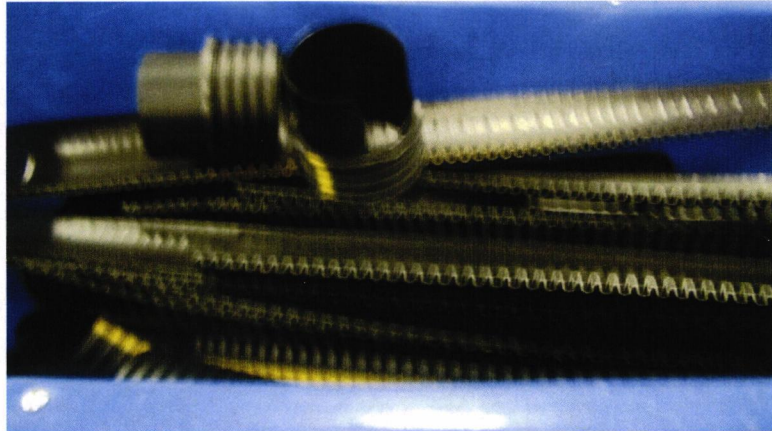
Report Photo #	Photographer	Date	Approx. Time	File Name (DSC00xxx.jpg)	Description
1	Joshua Buehre	05/08/2017	0818	003	Photo Not Included in inspection report
2	Joshua Buehre	05/08/2017	0819	004	Photo Not Included in inspection report
3	Joshua Buehre	05/08/2017	0908	014	Photo Not Included in inspection report

PRINSCO, INC  
JESUP, IA

Photo Number: 1  
Photographer: Joshua A. Buehre  
Date: 05/08/2017  
Time: 0818  
Description: Photo not included in  
inspection report.



Photo Number: 2  
Photographer: Joshua A. Buehre  
Date: 05/08/2017  
Time: 0819  
Description: Photo not included in  
inspection report





PRINSCO, INC  
JESUP, IA

Photo Number: 3  
Photographer: Joshua A. Buehre  
Date: 05/08/2017  
Time: 0908  
Description: Photo not included in  
inspection report





6mg 515 289 4029  
515 771 2622

7:40 - View from right of way - due to location  
on

7:46 - Arrival -

retired to conf. room when directed  
by \_\_\_\_\_ waiting for Jeremy \_\_\_\_\_

261.5.8<sup>3</sup>

60 employees full | part time

3 shifts - 7:00 am 3:00

3:00 - 11:00

11:00 - 7:00

5 days / week occasionally 6 days

Since 1974 - 1980 - Prinsco purchased in Nov. 2004

- Make corrugated drain tile (HDPE)

- Fittings

- coiled pipe -

- straight pipe

- change oil out in gear boxes 1-2 X / yr

- Black hawk co. waste

\* Only waste / rags thrown in trash  
2 photos

Scrap tile - reground and put back into production

use virgin product for DOT work



75-80% off pipe

get  
name  
+  
copy → chillers are glycol based  
- maintained by 3rd party

Scrap metal - Pool ngr has business  
on side - scraps (out)

waste  
Fluorescent lamps  
~~batteries~~ go in trash -

card board - blackhawk ~~eg~~ waste

all resins purchased - reuse what is ground up

{ used oil containers - have brought in oil  
- from Northland - oil  
- filtered  
- pay for oil - haven't bought in a year

Kenny -  
Belgore  
- Mechanic  
read coal/1002  
Parts washer - paint parts washer - no testing  
exists  
- mineral spirits - 20-25 gallons  
at charge out  
Brake kleen - ??

→ Aerosol cans - Thrown in garbage -

- oil Filters - couple hundred - couple hundred / yr  
- 11 forklifts 5 big yard

- use 30-40 rags / mo for cleaning with degreaser  
6 inches  
page 2 of 4



Jeff  
Clayton -  
Production  
Mgr. 1001/1002

Barrel  
of Antifreeze  
no paperwork

Lead acid batteries - sent to recycler kept in  
- trailer

Antifreeze - recycler of oil

- edge wood oil -

- no paperwork associated with it

Pallets - company buys use pallets

Plastic fluff/dust - from grumpy

- goes into trash

- collected in socks

5

40 oz / week  
100% 80 oz / day

SDS

Alcohol - used in lab 99.8% isopropyl Alcohol

- mixed with distilled water -

- used for density testing

- placed in 5 gallon container outside  
lab for "evaporation"

- less than 1" in container

- what is mixture w/ water -

Yard - 20 yd cont. - Trash -  
(2) 3 yd - weekly

SDS - #33 IPA, Mineral spirits, Brake Cleaner

- Walke Talkie batteries thrown in trash Lithium  
ion batteries



Raw Resin brought in

- mixed
- placed in extruders
- heated

6 extruders

1 - blow molding

4 - flexible

1 - solid (inner) pipe

Processed 17,000,000 lbs of plastic in 2016

✓ Vibeau



① Illegal disposal of hazardous waste.

40 CFR 262.5(g)(3)

② Failure to label used oil containers with

the words "used oil" 40 CFR 278.22(c)(1)

③ Failure to determine if used oil has above a hazardous constituent

or below 1000 ppm. 40 CFR 278.63(a)

JAB